# **EXHIBIT A**

1 2 3 4 5 6 7 8 9 10 11	QUINN EMANUEL URQUHART & S'Andrew H. Schapiro (Pro Hac Vice) andrewschapiro@quinnemanuel.com 191 N. Wacker Drive, Suite 2700 Chicago, IL 60606-1881 Telephone: (312) 705-7400  David Eiseman (Bar No. 114758) davideiseman@quinnemanuel.com 50 California Street, 22nd Floor San Francisco, California 94111-4788 Telephone: 415-875-6600 Fax: 415-875-6700  Stefan Berthelsen (Pro Hac Vice) stefanberthelsen@quinnemanuel.com 51 Madison Ave 22nd floor New York, NY 10010 Telephone: (212) 849-7014  Attorneys for Plaintiff X Corp.	ULLIVAN, LLP		
13	UNITED STATES DISTRICT COURT			
14	NORTHERN DISTRICT OF CALIFORNIA			
15	X CORP., a Nevada corporation,	Case No. 3:23-cv-03698-WHA		
16	Plaintiff,	SECOND AMENDED COMPLAINT		
17	BRIGHT DATA LTD., an Israeli	JURY TRIAL DEMAND		
18	corporation,			
19	Defendant.			
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X CORP.'S SECOND AMENDED COMPLAINT AGAINST BRIGHT DATA LTD. Case No. 3:23-cv-03698-WHA

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Plaintiff X Corp. ("X Corp.", "X", or "Plaintiff"), by and through its undersigned counsel, hereby files its First Amended Complaint against Defendant Bright Data Ltd., ("Bright Data" or "Defendant"), and in support thereof alleges as follows:

### **INTRODUCTION**

- 1. Defendant Bright Data Ltd. has built an illicit data-scraping business on the backs of innovative technology companies like X Corp., which operates the social media platform formerly known as Twitter and now known as X. Bright Data scrapes and sells millions of records from X Corp.'s X platform, in blatant violation of X Corp.'s Terms of Service, by which Bright Data is bound. Bright Data also induces and facilitates other X users to violate their own agreements with X Corp. by selling automated data-scraping tools and services that specifically target a wide range of X Corp. data.
- 2. Bright Data uses elaborate technical measures to evade X Corp.'s anti-scraping technology, taxing the resources of X Corp.'s servers in specific, quantifiable ways and hampering the user experience for legitimate X users.
- 3. Bright Data is aware that its activities violate X Corp.'s Terms because the company and its executives are registered X account holders who have agreed to abide by those Terms.
- 4. X Corp. brings this action for injunctive relief to halt Bright Data's unauthorized use of X Corp.'s platform and for damages caused by Bright Data's breach.

# THE PARTIES

- 5. Plaintiff X Corp. is a privately held corporation duly organized and existing under the laws of the State of Nevada with its principal place of business at 1355 Market Street, Suite 900, San Francisco, California, 94103. X Corp. owns and operates the social media platform X, formerly known as Twitter.
- 6. On information and belief, Defendant Bright Data was incorporated in Israel in 2008 as Zon Networks Ltd. and changed its name to Bright Data Ltd. in 2021. Bright Data has its principal place of business at 4 Hamahshev St., Netanya 4250714, in Israel. Bright Data has at times maintained an office at L415 Mission Street, 37th Floor, in San Francisco, California.

7. Defendant Bright Data operates brightdata.com, where it sells data scraped from numerous websites and social media platforms, including X, along with tools and services to scrape data from X and other platforms.

### JURISDICTION AND VENUE

- 8. This Court has jurisdiction over this action under 28 U.S.C. § 1332 because complete diversity exists, and the amount in controversy exceeds \$75,000. Plaintiff X Corp. is incorporated in Nevada with its principal place of business in California. Defendant Bright Data is incorporated in Israel with its principal place of business in Israel.
- 9. This Court has personal jurisdiction over Defendant because Defendant has consented to X Corp.'s Terms, which require all disputes related to the Terms be brought in the federal or state courts located in San Francisco, California. As part of its agreement to those Terms, Defendant also consented to personal jurisdiction in California.
- 10. Additionally, this Court has personal jurisdiction over Defendant because Defendant knowingly directed prohibited conduct to California and California residents. Defendant offers its data sets and scraping tools for sale in California and to California residents, and has targeted X Corp., which has its principal place of business in California, as well as X Corp.'s users located in California.
- 11. Defendant markets and sells its products to California residents and businesses via a sales office in California, according to its website:

Figure 1: Screenshot of Bright Data's website on November 14, 2023



See Exh. A.

As recently as October 19, 2022, Defendant encouraged customers to contact Bright

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Data at its California sales office, as shown in Figure 2.

Figure 2: Screenshot from Bright Data's "Contact Us" page on October 19, 2022

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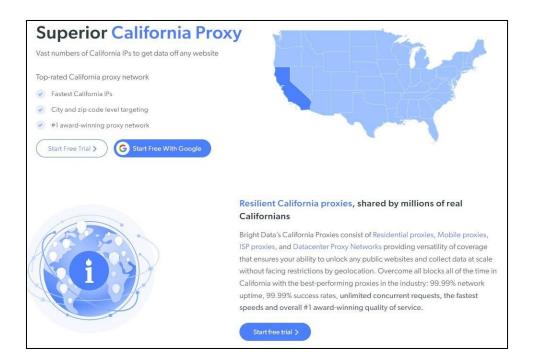
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San Francisco: Bright Data Inc. L415 Mission Street 37th Floor San Francisco, CA 94105

See Exh. B.

- 13. Members of Defendant's business development and sales team are also located in California. For example, Defendant's Chief Revenue Officer, who oversees Bright Data's sales operations, is based in the San Francisco Bay Area. See Exh. C. Defendant's Global Head of Presales is also based in California, along with numerous other Bright Data employees. See Exh. C.
- 14. Defendant has also specifically targeted its products at the California market. For instance, Defendant's interactive website, through which California residents can purchase Defendant's scraping tools and scraped data sets, offers a "Superior California Proxy" product that promises "[v]ast numbers of California IPs to get data off any website."

Figure 3: Screenshot from Bright Data's website on November 14, 2023



- See Exh. D. These proxy IP addresses are designed to evade usage restrictions and anti-scraping technology, such as those implemented by X. In fact, Defendant specifically advertises that its California proxies allow users to "[o]vercome all blocks all of the time in California."
- 15. On information and belief, Defendant has sold its scraping tools, scraped data sets, and IP proxies to X users, including X users in California, and has scraped data from X Corp. servers in California.
- 16. Venue is proper in this district under 28 U.S.C. § 1391, because a substantial part of the events or omissions giving rise to the claims occurred in this judicial district. During all relevant times, Defendant repeatedly, knowingly, and intentionally targeted its wrongful acts at X Corp., which has its principal place of business in this district. Defendant also, on information and belief, sold its scraping tools, scraped data sets, and IP Proxies to residents of this district, including through Defendant's sales office located in this district and employees located in this district.
- 17. Pursuant to Civil L.R. 3-2(d), this case may be assigned to either the San Francisco or Oakland division because X Corp. is located in San Francisco County.

# **FACTUAL ALLEGATIONS**

# A. X Corp.'s Platform and Terms of Service

 18. Plaintiff X Corp. owns and operates the social media platform X, accessible through twitter.com, X.com and various mobile and online applications. X's social media platform is multisided with a user side, a developer side, and an advertiser side.

# 1. The User Side & X. Corp Terms of Service

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19. The X user platform has hundreds of millions of active users worldwide. More than 23 million X accounts have been registered from California.

20. To create a forum for a global conversation about "what's happening," X Corp. allows its registered users to post and share content, including written comments, images and videos, known as posts, and to share, like and comment on other users' posts.

21. To post content on X or to re-post, like or otherwise interact with posts by others, users must register for an account and log in to that account.

22. Unlike open access websites, X Corp. does not make its platform and data broadly available to the general public. Rather, in order to gain full access to the X platform when visiting twitter.com, x.com, or downloading the X mobile application, a user must expressly agree to X Corp.'s Terms of Service, Privacy Policy, and the Rules and Policies (collectively the "Terms") by registering for an X account.

23. When an unregistered user visits the X homepage at x.com or twitter.com, the user is invited to create an account or sign in and notified that by signing up, the user will be agreeing to the Terms. Unregistered users are also notified that their unregistered use of the Platform constitutes acceptance of the Terms

24. To register for an account, users must provide their name, phone number or email address, and date of birth. To prevent automated services from registering for accounts, X Corp. requires potential account holders to complete a "CAPTCHA" fraud-detection process to determine whether the user is human. CAPTCHA stands for "Completely Automated Public Turing test to tell Computers and Humans Apart." X Corp. then verifies registrants through email or phone

confirmation.

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- 25. X users do not pay for basic access to the X user platform, but they can pay for Premium access with extra features.
- 26. Instead, all users who register for a X account, and/or view the X website or application agree to a binding contract with X Corp. as outlined in X Corp.'s User Agreement, which is comprised of the Terms.
- 27. X Corp.'s Terms state that a user may not "access, tamper with, or use non-public areas of the Services, our computer systems, or the technical delivery systems of our providers" or "breach or circumvent any security or authorization measures."
- 28. X Corp.'s Terms also state a user may not "access or search or attempt to access or search the Services by any means (automated or otherwise) other than through our currently available, published interfaces that are provided by us (and only pursuant to the applicable terms and conditions), unless you have been specifically allowed to do so in a separate agreement with us."
- 29. In addition, X Corp.'s Terms specifically state that "crawling or scraping the Services in any form, for any purpose without our prior written consent is expressly prohibited."
- 30. Under the Terms, users may not "forge any TCP/IP packet header or any part of the header information in any email or posting, or in any way use the Services to send altered, deceptive or false source-identifying information."
- 31. Users are also prohibited under the Terms from any conduct that would "interfere with, or disrupt, (or attempt to do so), the access of any user, host or network, including ... overloading, flooding, spamming ... or by scripting the creation of Content in such a manner as to interfere with or create an undue burden on the Services."
- The Terms also incorporate by reference X Corp.'s Platform Manipulation and Spam 32. Policy (the "Policy"), which specifically prohibits "coordinated harmful activity that encourages or promotes behavior which violates [X Corp.'s] Rules." The Policy also prohibits "leveraging X's open source code to circumvent remediations or platform defenses."
- 33. The Terms prohibit selling any content collected from the platform. Users may not "reproduce, modify, create derivative works, distribute, sell, transfer, publicly display, publicly

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perform, transmit, or otherwise use the Services or Content on the Services" unless otherwise authorized by the Terms or a developer agreement.

- 34. The Terms further provide that "[b]y submitting, posting or displaying Content on or through the Services, you grant us a worldwide, non-exclusive, royalty-free license (with the right to sublicense) to use, copy, reproduce, process, adapt, modify, publish, transmit, display and distribute such Content in any and all media or distribution methods now known or later developed." This nonexclusive "license authorizes us to make your Content available to the rest of the world and to let others do the same," but this non-exclusive license is subject to the Privacy Policy.
- 35. The Privacy Policy allows X users to choose their privacy settings from a menu of privacy options that gives them the ability to withdraw their consent for data sharing, and/or choose what content is publicly shared.
  - 36. X users can adjust their individual privacy settings at any time.
- 37. X gives users the ability to download their X user data profile which displays what content and information X has collected based on their interactions with the X user platform.
- 38. X users may also choose to delete their content and/or interactions with posts of other X users.
- 39. X has platform mechanisms whereby X users subject to the jurisdiction of, for example, the California Consumer Privacy Act or the European Union's General Data Protection Regulation, may exercise their various privacy rights under those acts, including making certain deletion requests.

# 2. The Developer Side & Developer Agreement

- For developers who wish to retrieve or analyze X Corp.'s specialized suite of select 40. aggregations of user Content into X data, X Corp. offers specialized access to its Application Programming Interfaces ("APIs") through a tiered subscription service.
- 41. The API subscription service offers developers a Free, Basic, Pro, and Enterprise tier, each of which offers increasing degrees of access to X data, rate limit relaxations, post-limit increases, and data analytics from the user side of the X platform.

To access the Enterprise subscription tier for Twitter's API data access, developers

IP addresses originating in certain high risk jurisdictions are blacklisted from accessing

Not all X user content, including some X user content which is publicly accessible on

X Corp.'s Developer Agreement also limits the access of developers to X Corp.'s

For the X user content that is available through API access, these restrictions on

must affirmatively submit their proposed use cases so that X's developer team can review and

the user side of the X platform, however, is packaged in the highest API subscription tier with the

most access to X data. This includes, for example, certain information related to user's specific

content. The Agreement instructs developers that they may "not exceed or circumvent rate limits, or

any other limitations or restrictions described in this Policy or your agreement with Twitter, listed on

Each developer is subject to and bound by X Corp.'s Developer Agreement.

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X data through the API.

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developers' utilization of X data through the Developer Agreement include the following.
a. X developers must obtain X user consent before sharing specific X user content to promote a product or service, and before storing or sharing non-public or confidential X user information.

geographical locations and other information detailed below.

the Developer Site, or communicated to you by Twitter."

- b. X developers must comply with the protected and blocked status of X content, and API developers are prohibited from circumventing user blocking or account protections.
- c. X developers must delete from their databases any content that is deleted on X, whether deleted by a user or deleted by X for violations of the Terms or applicable laws—for example, revenge porn content. This includes the eventual deletion—after a maximum of period of 18 months—of all X user content after an X user deactivates or deletes their X account.
- d. X developers must modify any data modified on X, including when content is made private or deleted.

- e. X developers must not employ X user geodata on a standalone basis. In other words, X prohibits the development of user tracking, activity heat maps, or similar.
- f. X developers must not use the X data to create spam, X bot accounts, or automate processes on the X user side such as bulk X user following.
- g. X developers must not use X data to infer certain protected characteristics of X users which X does not share with developers even if an X user publicly posts this content on X's user platform. These protected characteristics include: health (including pregnancy), negative financial status or condition, political affiliations or belief, racial or ethnic origin, religious or philosophical affiliation or beliefs, sex life or sexual orientation, trade union membership, and whether the user has actually or is alleged to have committed a crime.
- h. X developers must comply with X user requests which X forwards to them under applicable privacy laws, including the CCPA and GDPR.
- i. X developers must not attempt to match X content, usernames, or accounts with a person, household, device, browser, or other off-X identifier without the user's express consent, unless the information was provided by the user or is otherwise publicly available (i.e., for public figures).
- j. X developers must not use acquired data for tracking or targeting sensitive groups, such as political activists or dissidents, performing background checks or personal vetting, credit or insurance risk analysis, individual profiling or psychographic segmentation, or the development of facial recognition software.

# 3. The Advertiser Side & Ad Policies

48. Advertisers may purchase targeted ad placements directed towards X users on the X platform subject to X Corp.'s Ads Policies, which expressly state that advertisers must follow the Terms and all X Corp. Rules, including rules in the Developer Agreement.

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- 49. X restricts how advertisers are able to target advertisements to X users based on a variety of protected characteristics.1
  - X prohibits advertisers from targeting minors with advertisements relating to alcohol, a. tobacco, firearms, gambling and other inappropriate content.
  - X bans all advertising aimed at minors younger than thirteen. b.
  - X Corp. requires preapproval for advertising relating to housing, lending, and credit. X generally prohibits advertising targeting user segments sharing sensitive characteristics, including health and pregnancy, negative financial status or condition, political affiliations or belief, race or ethnic original, religious or philosophical affiliation or beliefs, sex life or sexual orientation, trade union membership, and whether the user has actually or is alleged to have committed a crime—even if X users choose to publicly share this data as content on the X user platform.

# 4. The Balance of X's Multi-Sided Platform Business Model

- 50. To balance the complex, interrelated nature of its multi-sided platform business and simultaneously fulfill its use case as a forum for global public conversation on "what's happening," X must be able to credibly enforce its Terms on both its users (both registered and unregistered), developers, and advertisers. One particular risk is platform and user manipulation of various kinds through the combined use of both automated aggregated X user data and posting on the X user platform based on knowledge gleaned from this aggregate data. Policing this problem is made more difficult when X does not know which entities have gained access to its aggregated X user data because they have not received it through its tiered subscription service but instead from other sources, for example, from scraping.
- 51. As part of mitigating these risks, X has a number of Policies which are incorporated by reference into the Terms and which are intended to prevent nefarious actors from manipulating

<sup>&</sup>lt;sup>1</sup> Targeting of Sensitive Categories, X Business, https://business.x.com/en/help/adspolicies/campaign-considerations/targeting-of-sensitive-categories.html (last visited June 3, 2024).

users into engaging with accounts or information they otherwise would not.<sup>2</sup> X regularly disciplines accounts for breaking this policy, including providing warnings for suspicious content, limiting post engagement, and account suspension and termination. For example, over a recent six-month period, X:

- a. Suspended 169,396 accounts and removed 15,275 instances of conduct for violations of X's policies against sharing improper impersonation;
- b. Suspended 2,563 accounts and removed 62,537 instances of conduct for violations of X's policies against sharing personally identifiable information; and
- c. Suspended 119,508 accounts and removed 571,902 instances of conduct for violations of X's policies on illegal and regulated goods.
- 52. X also maintains an active civic integrity policy.<sup>3</sup> This policy prohibits false and misleading information about how to participate in a civic process, including elections, and established laws relating to civic processes. Users may not post information intended to mislead or intimidate voters in order to dissuade them from participating in elections. It also prohibits users from posting account with misleading and deceptive identities. In February 2021, X disclosed it removed 373 accounts and related instances of content attributed to state-linked information operations originating from Iran, Armenia, and Russia. X again disclosed in December 2021 that it removed 3,465 accounts connected to state-linked information operations from eight distinct jurisdictions: Mexico, the People's Republic of China (PRC), Russia, Tanzania, Uganda, and Venezuela. Every account and piece of content associated with these operations was permanently removed from the X platform.

<sup>&</sup>lt;sup>2</sup> Platform manipulation and spam policy, <a href="https://help.x.com/en/rules-and-policies/platform-manipulation">https://help.x.com/en/rules-and-policies/platform-manipulation</a>.

X Civic integrity policy, <a href="https://help.twitter.com/en/rules-and-policies/election-integrity-policy">https://help.twitter.com/en/rules-and-policies/election-integrity-policy</a>.

scheme.

53. X further has policies against both the use of deceptive marketing or misrepresentative business practices,<sup>4</sup> as well as the advertising of certain high-risk financial products and certain content related to cryptocurrencies.<sup>5</sup>

54. The availability of unrestricted third-party access to scraped data impacts X's ability to accurately and effectively prevent and deter market manipulation, scams, and fraud, increasing the burden on public resources that must be devoted to the regulation and prosecution of such crimes and bad acts, increasing the risk of harm to consumers.<sup>6</sup>

### B. Data Scraping & X's Technological Measures Designed to Prevent It

- 55. Scraping is the process of using automated means to collect content or data from a website. The process involves making a request to a website's server, downloading the results and parsing them to extract the desired data. Data scrapers typically send large volumes of these requests, taxing the capacity of servers and diminishing the experience for legitimate users.
- 56. X Corp. utilizes a variety of technological measures to detect and prevent automated systems—colloquially known as bots—from scraping data from its platform, including industry standard automation prevention techniques, such as CAPTCHAs, authorized "guest pass" tokens, registered user identification limits, IP rate limits, and anomaly detection tools, to put a fence around the X user platform.
- 57. X Corp.'s registration process requires potential registrants to pass through the following gates: passing a CAPTCHA; and entering a valid phone number or email address and inputting a verification code X sent to that email or phone number. After passing through these

<sup>&</sup>lt;sup>4</sup> X Deceptive & Fraudulent Content Policy, <a href="https://business.x.com/en/help/ads-policies/ads-content-policies/deceptive-and-fraudulent-content.html">https://business.x.com/en/help/ads-policies/ads-content-policies/deceptive-and-fraudulent-content.html</a>.

<sup>&</sup>lt;sup>5</sup> *X Financial products and services*, <a href="https://business.x.com/en/help/ads-policies/ads-content-policies/financial-services.html">https://business.x.com/en/help/ads-policies/ads-content-policies/financial-services.html</a>.

<sup>&</sup>lt;sup>6</sup> See, e.g., Press Release, SEC, SEC Charges Eight Social Media Influencers in \$100 Million Stock Manipulation Scheme Promoted on Discord and Twitter (Dec. 14, 2022)

https://www.sec.gov/news/press-release/2022-221; Press Release, U.S. Att'y's Off., N.D. Cal., Scottish Citizen Indicted For Twitter-Based Stock Manipulation Scheme (Nov. 5, 2015), https://www.justice.gov/usao-ndca/pr/scottish-citizen-indicted-twitter-based-stock-manipulation-

technological access gates, X registered users are assigned an X registered user "guest pass" token that grants access to the X platform.

- 58. Although registered users gain access to the X platform and data, guest pass tokens do not grant these users unrestricted access to X's platform. To protect the X user experience, ensure the functionality of the X platform, and to prevent scraping and automated access, X Corp. limits the access of registered X users in a variety of ways, for example, by setting rate limits on the number of accounts that a registered user may follow in given time periods.
- 59. X employs rate limits as a significant technological measures designed to fence scrapers out of the X user platform because of the massive volume of data available on it:
  - a. On average, about 250 million registered users log in to X every day with 550 million unregistered users visiting every month.
  - b. On average, there are about 500 million posts every day.
  - c. Based on internal X investigations, scraping generally entails about a million times more requests to X servers than a normal X user would make.
- 60. Without guest pass tokens, unregistered users' ability to access X posts or data by visiting x.com, twitter.com, or the X mobile application is highly circumscribed. While unregistered users have never had unfettered access to the X user platform, X has significantly curtailed this unregistered access in large part to prevent automated user access, including automated access for the purposes of scraping. Beginning in 2022 and accelerating in the early half of July 2023, X began to make far less content publicly available for unregistered users as compared with registered users.
- 61. If an unregistered user now accesses a registered user's profile page, the unregistered user is shown only a curated sample of the registered user's top posts, rather than all of that user's posts in chronological order as was previously possible on the X platform. Additionally, an unregistered user may access a specific, individual post through an external link to that specific post. Through internet search engines, unregistered users may also access only a limited subset of X posts—that is, not all posts are available on such search engines and the underlying X post statistics such as likes, replies, and reposts are no longer available—based on their search results.

- 62. Regardless, unregistered users could never freely browse the X platform or themselves interact with the posts, but they now cannot access replies to any posts or the user identities of users who liked those posts.
- 63. These changes have significantly degraded the unregistered X user experience but were necessary to attempt to tamp automated, unauthorized access to X's platform, including access by scrapers like Bright Data and its customers.
- 64. In other words, some X user content is designed to be solely accessible to X users, developers, or advertisers who are logged in to registered X accounts and/or is password-protected, unless those users circumvent X's technological measures which throttle access.
- 65. Regardless, when viewing the posts to which they have access, unregistered users are provided with a link to the Terms in the top right corner of the page.
- 66. In short, non-registered users without guest pass tokens have significantly less access to the X user content on the X platform, and they are subject to significantly higher rate limits. Developers who use the X API are also capped in the number of posts they may post to (or pull from) the platform based on their subscription level.
- 67. For that reason, aggregate data about X content is not publicly available, as casual internet users cannot access it. Accessing aggregate data about X is predicated on agreeing to the various terms and policies. On the other hand, Bright Data offers customers the ability to access "[h]undreds of millions" of records, some of which may have since been deleted, modified, or made private by X or X users, all without being subject to X's various restrictions.

### C. Catastrophic Damage from Automated Access

68. X employs a microservice server architecture system where its web-hosted applications are run on multiple servers run through two independent data centers. Specific servers within these data centers are allocated to various different software processes within the larger X application ecosystem.

<sup>&</sup>lt;sup>7</sup> Social Media Datasets, Bright Data, <a href="https://brightdata.com/products/datasets/social-media.">https://brightdata.com/products/datasets/social-media.</a>

1	69. In order to account for and avoid the catastrophic failure of X's platform servers an			
2	systems due to this automated circumvention of X rate limits and anomalous bot activity, X obtain			
3	an average projected additional of over-provisioned headroom for its server load capacit			
4	which it would not otherwise purchase in the absence of this circumvention of its technological			
5	measures and anomalous bot activity. This additional server load capacity amounts to an averag			
6	additional cost range of each month for X to run its platform that it would no			
7	otherwise incur in the absence of illicit scraping.			
8	70. On average, about is inauthentic and attributable t			
9	automated bots or software, including those bots or software employed by Bright Data and markete			
10	to its customers, not human users. On a normal day, X generally			
11				
12	Specific service path endpoints which are necessary to run X's larger platform but are high ris			
13	targets for scraping and demonstrate extremely high proportions of inauthentic and anomalous well			
14	requests, including the following:			
15	a. of web requests to view are anomalous of			
16	inauthentic.			
17	b. of the web requests to look up are anomalous of			
18	inauthentic.			
19	c. of the web requests to look up are anomalous of			
20	inauthentic.			
21	d. of web requests to look up are anomalous of			
22	inauthentic.			
23	e. of web requests to access are anomalous or inauthentic.			
24	f. of web are anomalous of			
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26	71. Because X allocates specific server capacity to the server server.			
27	requests lead to for the			
28	scraping targets. Even when specific servers are overloaded, X's			
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	attempts to ensure that the system or	verall is less likely to fa	il entirely, but these isolate
failures lead	1 to		

- 72. If X Corp. did not purchase this additional server load capacity and pay the accompanying energy costs, the X user platform would fail at intermittent but regular intervals and thus significantly degrade X's user experience. It is a reputational and business imperative as a public-facing content sharing platform primarily regarding "what's happening" moment to moment that X's servers be available 24/7 with as few outages as possible, so X is forced to incur these additional costs which it would not otherwise bear.
- it is to respond and remedy anomalous access on X, which is constantly evolving as X must understand, assess, and stymie new methods of automated, anomalous, and inauthentic access of its platform. Over the last year, this team where scraping was detected. Of course, this team cannot respond to undetected scraping, which Bright Data enables.

On top of server costs, X employs a dedicated team of operational engineers whose job

- 74. And outside of the direct costs posed by the data scraping activity, the continued presence of bots, fake profiles, and data scrapers impacts X's relationship with its users, who participate in X's services on a presumption of trust that X can enforce its policies relating to privacy and user content authenticity, among others.
- 75. Or, if X registered users grow dissatisfied with X's particular cocktail of public-private content-and-data sharing, X users can delete their registered X accounts such that X and its developers eventually delete that content and data as well.

# D. Defendant Has Agreed to X Corp.'s Terms of Service

- 76. Defendant has expressly agreed to X Corp.'s Terms and is therefore bound by those Terms.
- 77. Initially, by using the X platform, Defendant, which is well aware of the Terms, agrees to be bound by them. The Terms specifically state:

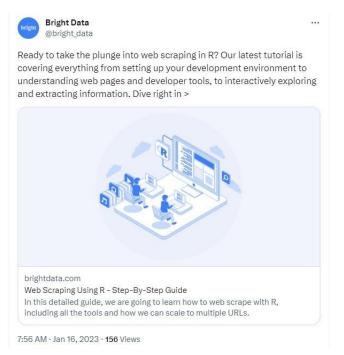
These Terms of Service ("Terms") govern your access to and use of our services, including our various websites, SMS, APIs, email notifications, applications, buttons, widgets, ads, commerce services, and our other covered services

(https://help.x.com/rules-and-policies/x-services-and-corporate-affiliates) that link to these Terms (collectively, the "Services"), and any information, text, links, graphics, photos, audio, videos, or other materials or arrangements of materials uploaded, downloaded or appearing on the Services (collectively referred to as "Content"). By using the Services you agree to be bound by these Terms.

- 78. In addition to agreeing to the Terms by using X services, Defendant, which has maintained a registered account on X (@bright\_data) since at least February 2016, expressly accepted and agreed to the Terms when registering its account. Bright Data's X account frequently posts content promoting the company's products and services.
- 79. Defendant's top executives are also registered X users and expressly agreed to X Corp.'s Terms when registering their accounts, further demonstrating that Bright Data had knowledge of the Terms:
  - a. Bright Data's CEO, Or Lenchner, has maintained a registered account on X (@orlench) since at least December 2012 and regularly posts from that account.
  - b. Bright Data's CMO, Yanay Sela, has maintained a registered X account (@yanay\_sela) since at least December 2014.
  - c. Bright Data's Managing Director for North America, Omri Orgad, has maintained a registered X account (@omri\_orgad) since at least November 2011.
  - d. Bright Data's Vice President of Product, Erez Naveh, has maintained a registered X account (@nerez) since at least August 2009.
  - e. Bright Data's Global Communications Manager, Zachary Keyser, has maintained a registered X account (@KeyserZachary) since at least December 2019.
  - f. Bright Data's Founder, Ofer Vilenski, has maintained a registered X account (@vilenski) since at least November 2008.
- 80. On information and belief, several other employees and agents of Defendant involved in Defendant's data-scraping activities are also X account holders, including, by way of example, Artem Shibakov, a Bright Data software engineer who has maintained a registered X account (@ashibakow) since at least February 2013. These account holders have also expressly accepted and agreed to X Corp.'s Terms.

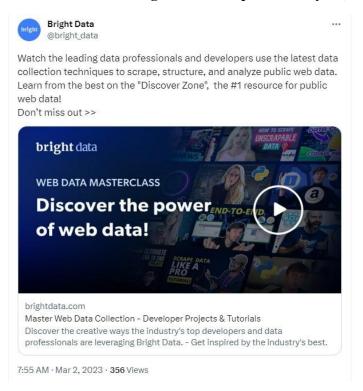
- 81. Defendant is additionally subject to the Terms as an advertiser on X. Beginning on March 7, 2016, Defendant (then known as Luminati Networks) purchased advertising on the X platform. Defendant purchased additional advertising on X from 2019 to 2021. As stated in X Corp.'s Ad Policies, to which Defendant expressly agreed, all advertisers are bound by the platform's Terms and Rules.
- 82. Defendant and its executives have repeatedly used these X accounts to discuss and promote their data-scraping products and services, including but not limited to the following posts:
  - a. On January 1, 2023, Defendant posted a video on X entitled "How to Scrape UNSCRAPABLE data!" which demonstrated how to use Defendant's tools and services for unauthorized data scraping.
  - b. On January 16, 2023, Defendant encouraged users in a post on X to "take the plunge into web scraping" using a "step-by-step guide" to Defendant's tools and services.

Figure 4: Screenshot of Bright Data's X post on July 11, 2023



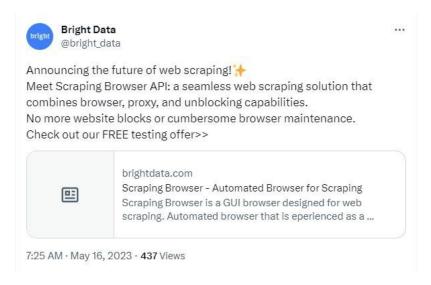
c. On March 2, 2023, Defendant posted a video on X to a "masterclass" that showed "the latest data collection techniques to scrape, structure, and analyze public web data" using Defendant's tools and services.

Figure 5: Screenshot of Bright Data's X post on July 11, 2023



- d. On March 23, 2023, Defendant posted a promoted its "Web Unblocker" and its ability to "bypass[] multiple anti-bot solutions" in a post on X.
- On May 16, 2023, Defendant promoted its "Scraping Browser API: a seamless web e. scraping solution that combines browser, proxy, and unblocking capabilities" with a link to a "FREE testing offer" in a post on X.

Figure 6: Screenshot of Bright Data's X post on July 11, 2023



# E. Defendant's Unauthorized Scraping

- 83. Defendant, per its own admissions, has engaged in widespread scraping of X Corp.'s data, circumventing X Corp.'s technical barriers and violating the Terms to which it agreed. Defendant has also facilitated the scraping of data from X and induced X users to violate X Corp.'s Terms.
  - 84. X Corp. has not granted Defendant permission to scrape data from the X platform.
- 85. X Corp permits paying developers and advertisers to lawfully access certain categories of X data, subject to contractual usage limits and other restrictions designed to protect the X platform and user experience as detailed above. Rather than attempt to lawfully acquire X data through authorized means, Bright Data elected to scrape the data (and enable others to do so), using proxies and other illicit methods to shield its identity and scraping activities.
- 86. Defendant has not publicly disclosed how it evades X Corp.'s technical safeguards against scraping. However, Defendant's website makes clear that the company engages in prohibited scraping on an industrial scale and brazenly advertises that Defendant sells tools and services that encourage and enable others to engage in prohibited scraping.
- 87. Defendant's public reputation is that it is a market leader in scraping social media platforms such as X on a massive scale.

### Defendant Scrapes and Sells X Corp. Data

88. As seen in Figure 7 below, Defendant offers X Corp.'s data for sale on its website.

Figure 7: Screenshot of Bright Data's website on July 10, 2023

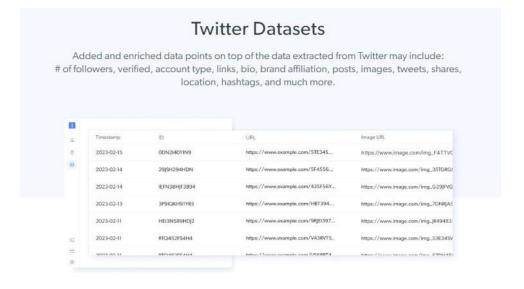




See Exh. E.

89. According to Defendant's website, the X Corp. data sets offered for sale by Defendant include "millions of pages and tens of millions of data points." Specifically, these data sets include the following user information: "# of followers, verified, account type, links, bio, brand affiliation, posts, images, tweets, shares, location, hashtags, and much more."

Figure 8: Screenshot of Bright Data's website on July 10, 2023



See id.

- 90. Defendant could have only obtained this data by engaging in prohibited scraping of X's platform.
- 91. Defendant offers this unlawfully obtained data for sale starting at \$.01 per record, but also offers customized packages of X Corp.'s data.
- 92. Defendant also offers several options for delivery of X Corp.'s data, and even offers its customers the opportunity to regularly update its data sets with additional data scraped from X at regular intervals.

# Bright Data Sells Automated Tools to Scrape X Corp.'s Data

93. Defendant also offers for sale on its website automation software that allows users to scrape data directly from the X platform in violation of X Corp.'s Terms.

94. As indicated in Exhibit F, Defendant's website states: "If you don't want to purchase a Twitter dataset, you can start scraping Twitter public data using our Web Scraper IDE."

Figure 9: Screenshot of Bright Data's website on July 10, 2023



See Exh. E.

- 95. Defendant's Web Scraper tool allows individuals to evade detection utilizing a proxy network in order "to remain anonymous, avoid IP blocking, access geo-restricted content, and improve scraping speed." The tool also includes an "unblocking solution" that is designed to evade antiscraping measures like those employed by X Corp. Defendant specifically advertises that its Web Scraper tool can be used to "[e]asily scrape data from any geo-location while avoiding CAPTCHAs and blocks."
- 96. In addition to its Web Scraper tool, Defendant sells at least four additional tools designed to scrape information specifically from the X Platform: Twitter Scraper, Twitter Profile Scraper, Twitter Image Scraper, and Twitter Followers Scraper.
  - a. As seen in Figure 7 below, Defendant offers a Twitter Scraper to automatically scrape data from the X platform, including "URLs, hashtags, images, videos, tweets, retweets, conversation threads, followers/following, locations, and more."

Figure 10: Screenshot of Bright Data's website on July 10, 2023

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See Exh. F.

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b. As seen in Figure 11 below, Defendant offers a Twitter Profile Scraper to automatically "collect data such as user name, display name, likes, tweets and retweets, replies, location, Twitter handle, following/followers, URL, date of creation, and more."

Figure 11: Screenshot of Bright Data's website on July 10, 2023



See Exh. G.

c. As seen in Figure 12 below, Defendant also offers a Twitter Image Scraper to automatically "collect data such as user name, Twitter handle, following/followers, location, URL, date of creation, and more."

Twitter Image Scraper

Twitter Followers Scraper

Scrape Twitter followers and collect data such as: name, number of followers, profile URLs, images, company URL, and more.

Start Free Trial >

Start Free Trial >

Scrape Twitter images and collect data such as user name, Twitter handle, following/followers, location, URL, date of creation, and

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See Exh. H.

d. As seen in Figure 13 below, Defendant has also offered a Twitter Followers Scraper to automatically collect data such as "name, number of followers, profile URLs, images, company URL, and more."

Figure 13: Screenshot of Bright Data's website on July 10, 2023

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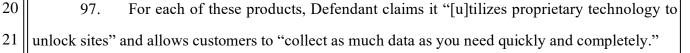
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See Exh. I.



- 98. Because X user likes and replies are no longer publicly accessible on the X platform unless logged in as a registered user, the Twitter Profile Scraper required logged-in scraping or the circumvention of X's technological measures designed to prevent access to X data that is only available when logged in as a registered X user.
- 99. Defendant was and is aware that its scraping tools targeted at X's platform may be used for logged-in scraping as well as public scraping.

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14 below, Bright Data markets this product for scraping X Corp.'s data.

Figure 14: Screenshot of Bright Data's website on July 10, 2023

"Scraping Browser" that simplifies the act of scraping data from the X platform. As seen in Figure

In addition to these X-specific scraping tools, Bright Data offers an automated

\* New! Meet Scraping Browser: Everything you need for Twitter scraping Learn in one automated browser more >

See Exh. G.

- 101. Defendant advertises this "Scraping Browser" as containing "all website unlocking operations under the hood, including: CAPTCHA solving, browser fingerprinting, automatic retries, selecting headers, cookies, & Javascript rendering, and more." Defendant also claims its Scraping Browser "automatically learns to bypass bot-detection systems as they adapt, saving you the hassle and cost."
- 102. The Scraping Browser allows Defendant's customers to "appear as a real user browser to bot-detection system[s]," such as those used by X Corp.

#### Bright Data Sells Proxy Services to Facilitate Data-Scraping

- Defendant also facilitates the violation of X Corp.'s Terms by offering proxy services 103. specifically designed to evade anti-scraping measures, including X Corp.'s CAPTCHAs and its registered user identification and IP rate limits. These tools allow unregistered users to impersonate registered X users bypass X Corp.'s digital fence and gates.
- These proxy services imitate requests from legitimate users in order to conceal the true requestor's IP address and location. Defendant advertises that these proxies will "avoid[] IP bans and CAPTCHAs" and allow users to "[g]ather vast amounts of public web data with total anonymity." See Exh. J.
- 105. By posing as legitimate, registered X-users from repeatedly changing IP addresses using its proxy services, Bright Data accumulates guest pass tokens so it can use and sell them packaged with its scraping services at scale. This allows Bright Data and its customers to present "fake" guest pass tokens to pose as registered X users to pass through X's technological gates.

106. Due to the "total anonymity" of the scraping which Bright Data thus enables, X users have no way of knowing which parties—whether Defendant or Defendant's customers—have scraped their user and X's content. Thus, any legal privacy restrictions which users must enforce themselves and to which Defendant or its customers is subject—whether provisions of the CCPA or the GDPR—is virtually meaningless: X users cannot enforce those privacy rights if they do not know whom to approach.

- 107. Consider that Bright Data ostensibly falls into the California Privacy Protection Agency's classification of a "data broker" as a "business that knowingly collects and sells to third parties the personal information of a consumer with whom the business does not have a direct relationship," but Bright Data is not registered on the public California "data broker" registry as of May 31, 2024.8
- 108. Indeed, official governmental representatives from foreign countries such as Australia, Canada, the United Kingdom, Switzerland, Norway, New Zealand, Colombia, Morocco, Argentina, and Mexico recently issued a "Joint statement on data scraping and the protection of privacy" that highlighted the risks to privacy flowing from inadequate prevention of scraping by social media platforms such as X.<sup>9</sup>
- 109. Even if X users were aware of Bright Data's scraping of their data, Bright Data does not in its Acceptable Use Policy provide analogous privacy features and control over X user data once Bright Data or its customers scrape it from the X platform:
  - a. Bright Data does not require itself or its customers to delete or make private any data scraped from X after an X user has deleted or privatized it;
  - Bright Data does not prohibit tracking of individuals based on the characteristics which
     X protects;

<sup>&</sup>lt;sup>8</sup> Data Broker Registry, Cal. Privacy. Prot. Agency, <a href="https://cppa.ca.gov/data\_broker\_registry/">https://cppa.ca.gov/data\_broker\_registry/</a> (last visited May 31, 2024).

<sup>&</sup>lt;sup>9</sup> Glob. Priv. Assembly, Int'l Enf't Coop. Working Grp., *Joint Statement on Data Scraping and the Protection of Privacy* (Aug. 24, 2023), https://ico.org.uk/media/about-the-ico/documents/4026232/joint-statement-data-scraping-202308.pdf

- c. Bright Data does not prohibit matching X usernames to users' legal identities or personally identifying information;
- d. Bright Data does not prohibit users from using geodata to track X users, including the creation of heat maps or user location profiles, even in circumstances in which that information is potentially highly sensitive;
- e. Bright Data does not prohibit its scraped data from being used (including by foreign governments) to assist in election interference, voter suppression, or the tracking and targeting of sensitive groups, including activists and political dissidents; and
- f. Bright Data does not prohibit its scraped data being used for individual profiling, psychographic segmentation, background and credit checks, or the development of facial recognition.

### **FIRST CAUSE OF ACTION**

(Breach of Contract)

- 110. X Corp. realleges and incorporates all preceding paragraphs herein.
- 111. Use of the X platform and use of X Corp.'s services are governed by X Corp.'s Terms.
- 112. X users, including Defendant, accept the Terms as a condition of using the platform.
- 113. Moreover, by virtue of having X accounts, Defendant has expressly accepted and agreed to X Corp.'s Terms.
  - 114. The Terms are enforceable and binding on Defendant.
- 115. Defendant has repeatedly violated the Terms, including by (i) accessing the X platform through automated means without specific authorization from X Corp.; (ii) scraping data from the X platform without authorization; (iii) selling tools that enable others, including X users, to access the X platform by automated means and to scrape data; (iv) selling proxy services that enable others, including X users, to access the X platform by automated means and evade X Corp.'s anti-automation and anti-scraping tools; and (v) selling data that Defendant scraped from the X platform.
- 116. Defendant has breached and continues to breach the Terms by scraping data from X Corp.'s platform without prior consent from X Corp. X Corp. has never authorized Defendant to access its platform through automated means and has never given Defendant consent to scrape data.

- 117. Despite being bound by the Terms, Defendant has repeatedly accessed the X Corp. platform through automated means and scraped data in violation of the Terms.
- 118. Defendant has breached, and continues to breach, X Corp.'s Terms by accessing the platform through unauthorized means and scraping data from the platform.
- 119. Defendant has breached, and continues to breach, X Corp.'s Terms by selling tools that allow other X users to access the platform by automated means and scrape data, and by selling proxy services that allow the same.
- 120. Defendant has breached, and continues to breach, X Corp.'s Terms by selling data that Defendant has scraped from X Corp.'s platform.
- 121. Defendant's conduct—both accessing X Corp.'s platform in volumes and manners that violate the Terms as well as selling data scraped from X Corp.'s platform—has damaged X Corp. and caused and continues to cause irreparable harm and injury to X Corp.
- 122. X Corp. is entitled to compensatory damages, injunctive relief, declaratory relief, and/or other equitable relief.

# **SECOND CAUSE OF ACTION**

(Tortious Interference with Contract)

- 123. X Corp. realleges and incorporates all preceding paragraphs herein.
- 124. All X users must agree to abide by the Terms, which constitute a valid and enforceable agreement between X Corp. and each user.
- 125. As a user of X Corp.'s platform, as well as a present or former X account holder, Defendant is aware of the Terms and that they govern all users who choose to interact with the X platform. Defendant is also aware of the Terms because several of its executives and employees are present or former X account holders.
- 126. Nevertheless, Defendant has marketed and sold its scraping tools to X users and account holders, including X users and account holders residing in California, through its interactive website accessible in California and elsewhere, through its sales office and employees in California and elsewhere, and by using the X platform to market its scraping services to other X users and account holders.

- 127. Defendant has also sold proxy services and tools to facilitate automated access and scraping of the X platform by X users and account holders, including by locally offering a "Superior California Proxy" with "[v]ast numbers of California IPs to get data off any website."
- 128. By offering services and tools designed to provide automated access to the X platform, and to scrape data from the platform, Defendant induced a breach or disruption of the Terms by X users.
- 129. On information and belief, those who purchased Defendant's scraping services and tools used them to access X through unauthorized, automated means and to scrape data from the X platform, in violation of the Terms.
- 130. Defendant's conduct has damaged X Corp. and caused and continues to cause irreparable harm and injury to X Corp.
- 131. X Corp. is entitled to compensatory damages, injunctive relief, declaratory relief, and/or other equitable relief.

# THIRD CAUSE OF ACTION

(Unjust Enrichment, in the alternative)

- 132. X Corp. realleges and incorporates all preceding paragraphs herein.
- 133. If Defendant's acts are found not to be in breach of contract, then Defendant's acts as alleged herein constitute unjust enrichment at X Corp.'s expense.
- 134. Defendant used X Corp.'s service, platform, and computer network without authorization to scrape data from the X platform.
- 135. Defendant receives benefits in the form of profits from its unauthorized scraping of X Corp. data.
- 136. Defendant's retention of the profits derived from its unauthorized scraping of data would be unjust.
- 137. Defendants' conduct has damaged X Corp., including but not limited to hampering the user experience for authentic X users and customers, in addition to the time and money spent investigating and mitigating Defendants' unlawful conduct.

FIFTH CAUSE OF ACTION<sup>10</sup>

(Unlawful, Unfair or Fraudulent Business Practices (Cal. Bus. & Prof. Code § 17200 et seq.))

- 148. X Corp. realleges and incorporates all preceding paragraphs herein.
- 149. Defendant's actions described above constitute unlawful, unfair, or fraudulent acts or practices in the conduct of a business, in violation of California's Business and Professions Code Section 17200, et seq, including because they constitute trespass and tortious interference with business relationships in violation of the law, and because Defendant deceived X Corp. into providing it access to, and information from, the X Corp. computer network. Defendant's data- collection technology and its data-scraping tools deliberately misrepresented the requests sent to the X platform, posing as legitimate X users, and Defendant's sale of IP proxies masquerades as a legitimate X user to avoid X Corp.'s technical measures designed to prevent unauthorized access of its computer servers.
- 150. Scraping data, as well as circumventing X Corp.'s ability to police its own platform, has caused substantial injury to X Corp., in the form of costs to investigate, remediate, and prevent Defendant's wrongful conduct, among other injuries.
- 151. As a result of Defendant's various acts and omissions, X Corp. has suffered and continues to suffer irreparable harm for which there is no adequate remedy at law, and which will continue unless Defendant's actions are enjoined.

#### SIXTH CAUSE OF ACTION

(Misappropriation)

- 152. X Corp. realleges and incorporates all preceding paragraphs herein.
- 153. X Corp. has invested substantial time, labor, skill, and financial resources into the creation and maintenance of X, its computer systems, and servers, including system and server capacity, as well as the aggregated data at scale. Defendant has not invested any of its own time nor resources to the development of the X platform.

Mindful of the Court's Order dismissing this claim, ECF No. 83, X Corp. includes the Fifth Cause of Action not for the purpose of re-argument but to preserve the issue.

- 154. Defendant used automated means—in violation of X Corp.'s Terms—to wrongfully access the X platform, systems and servers, including systems and servers located in California, and obtain aggregated data at scale from the X platform.
- 155. Defendant appropriated this aggregated data at scale at little or no cost to Defendant, free-riding on X Corp.'s substantial investment of time, effort and expense to aggregate this data at scale.
- 156. As a result of Defendant's misappropriation, X Corp. has been forced to expend additional time, labor, skill and financial resources to investigate and mitigate Defendant's wrongful conduct. Defendant has been able to exploit and profit from X Corp.'s substantial investments in the X platform and the creation of its aggregated data at scale.
- 157. X Corp. has been and will continue to be damaged as a result of Defendant's misappropriation.
- 158. X Corp. has suffered and will continue to suffer irreparable injury, and its remedy at law is not itself adequate to compensate it for injuries inflicted by Defendant.

# PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief, as follows:

- 1. Preliminary and permanent injunctive relief enjoining Bright Data, its agents, officers, employees and successors from:
  - a. accessing or using X Corp.'s website, servers, systems, and any data contained therein for purposes of unlawful data scaping;
  - b. developing or distributing any technology or product that is used, or could be used, for the unauthorized scraping of data from X;
  - c. facilitating the scraping of data by other users;
  - d. selling or offering for sale any data previously obtained from X;
  - e. utilizing any proxies to access X's website, servers, systems, and any data contained therein; and
  - f. selling or offering for sale any proxies that can be used to access X's website, servers, systems, and any data contained therein.

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1	2.	That Defendant be required to identify the location of any and all data obtained from				
2	the X platfo	the X platform and to destroy any and all such data;				
3	3.	That Defendant be required to identify any and all recipients of data obtained from				
4	the X platform;					
5	4.	Compensatory, statutory, and punitive damages, as permitted by law and in such				
6	amounts to be proven at trial;					
7	5.	Reasonable costs, including reasonable attorneys' fees;				
8	6.	6. Pre- and post-judgment interest, as permitted by law;				
9	An accounting of Defendant's profits from its scraping activities and disgorgement of those					
10	profits; and					
11	Any	other remedy to which Plaintiff X Corp., Inc. may be justly entitled.				
12						
13	Dated: Jun	e 6, 2024 Respectfully submitted,				
14		_/s/ Andrew H. Schapiro				
15		QUINN EMANUEL URQUHART & SULLIVAN, LL				
16		Andrew H. Schapiro ( <i>Pro Hac Vice</i> ) andrewschapiro@quinnemanuel.com				
17		191 N. Wacker Drive, Suite 2700 Chicago, IL 60606-1881				
18		Telephone: (312) 705-7400				
19		David Eiseman (Bar No. 114758) davideiseman@quinnemanuel.com				
20		50 California Street, 22nd Floor San Francisco, California 94111-4788				
21		Telephone: 415-875-6600 Fax: 415-875-6700				
22		Stefan Berthelsen (Pro Hac Vice)				
23		stefanberthelsen@quinnemanuel.com 51 Madison Ave 22nd floor				
24		New York, NY 10010 Telephone: (212) 849-7014				
25		Attorneys for Plaintiff X Corp.				
26						
27						
28						

**DEMAND FOR JURY TRIAL** Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff hereby demands a trial by jury of all triable issues. Dated: June 6, 2024 QUINN EMANUEL URQUHART & SULLIVAN, LLP By: \_\_/s/ *Andrew H. Schapiro* Andrew H. Schapiro 

X CORP.'S SECOND AMENDED COMPLAINT AGAINST BRIGHT DATA LTD. Case No. 3:23-cv-03698-WHA

# EXHIBIT A

#### **Contact us**

We're here to support you, and get you the data you need. Fast.

#### 24/7 Live Support

Contact our attuned support agents with any questions.



#### Sales Inquiries

Contact Sales to find the right plan that best fits your needs



#### **Report Suspected Abuse**

Protect other customers and the Bright Data network by reporting suspicious activity.



#### Join the Affiliate Program

Promote Bright Data on your website or social media, and earn commission.



#### Work with Us

Explore our job opportunities, and create a better internet.



#### The Bright Initiative

Learn about our work with universities, research institutions, and governments.

Visit the Bright Initiative >

#### **Media Inquiries**

https://brightdata.com/contact 1/4





#### Our global sales team



## Our offices



#### New York:

#### Bright Data Inc.

500 7th Ave, 8th Floor, New York, NY 10018

Building Front Desk (US): +1 917-473-2601

https://brightdata.com/contact 2/4

4 Hamahshev St., Netanya 4250714, Israel (POB 8025)

Beit Ilan, Poleg Industrial Center Parking: There's a parking lot behind (south of) our building (entrance from HaTsoran st.)

Main Office Tel: +972-9-8355993

Fax: +972-9-8355003



#### Let's get social









**PRODUCTS** PROXY SERVICES Datasets Residential Proxies Web Scraper IDE Mobile Proxies Scraping Browser ISP Proxies SERP API **Datacenter Proxies** Bright Insights Proxy Servers Web Unlocker Proxy IP Locations Proxy Manager Proxy Solutions Proxy Browser Extension Proxy API PRICING LEARNING CENTER Proxy Network **Data Documentary** Web Scraper IDE Iron Analyst Scraping Browser Web Data Masterclass SERP API FAQ Datasets Webinars **PROGRAMS** LEGAL Impact Report 2023 Patents Affiliate Program Privacy Policy Partners Cookies Settings SDK Don't Sell My Personal Info Security Vulnerabilities Ethical

https://brightdata.com/contact

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bright data





https://brightdata.com/contact 4/4

# EXHIBIT B

#### Contact us

We're here to support you, and get you the data you need. Fast.

24/7 Live Support

Contact our attuned support agents with any questions.



Sales Inquiries

Contact Sales to find the right plan that best fits your needs



Report Suspected Abuse

Protect other customers and the Bright Data network by reporting suspicious activity.



Join the Affiliate Program

Promote Bright Data on your website or social media, and earn commission.



Work with Us

Explore our job opportunities, and create a better internet.



The Bright Initiative

Learn about our work with universities, research institutions, and governments.



Our global sales team



Our offices

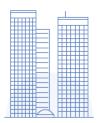


#### New York:

Bright Data Inc.

106 W 32nd St, New York, NY 10001,
United States

Customer Tel (US): +1-888-538-9204



#### Israel:

Bright Data Ltd.

3 Hamahshev St., Netanya 4250713, Israel (POB 8025)

Beit Ariel, Ground floor, Poleg Industrial Center Parking: Big lot behind (north of) our building

Main Office Tel: +972-9-8355993 Customer Tel (IL): +972-54-353-6332 Fax: +972-9-8355003



#### San Francisco:

Bright Data Inc.

L415 Mission Street 37th Floor San Francisco, CA 94105

# EXHIBIT C







## Gunja Gargeshwari

Chief Revenue Officer (CRO) Bright Data San Francisco Bay Area

2K followers · 500+ connections





See your mutual connections

Join to view profile



**Bright Data** 

## Activity







I am excited to announce my new role as Vice President & General Manager for Latin America at Databricks, a company at the forefront of the data and...

Liked by Gunja Gargeshwari



Amazon reports better-than-expected results, as revenue jumps 13% -Earnings per share: 94 cents per share vs. 58 cents per share expected by...

Liked by Gunja Gargeshwari







Hoje foi um daqueles dias felizes, em que você acha que tudo o que vc construiu foi para um bem maior, me sinto assim. Uma das minhas mentoras um... Liked by Gunja Gargeshwari

Join now to see all activity

## Experience



#### Chief Revenue Officer (CRO)

Bright Data

Feb 2023 - Present · 9 months

San Francisco Bay Area



## VP, WW Sales Platform, ZD Sunshine Conversations and ZD Sell Zendesk

Jan 2019 - Feb 2023 · 4 years 2 months

San Francisco, California





Jun 2015 - Jan 2019 · 3 years 8 months

San Francisco Bay Area

Lead a team of sellers managing ISV focused accounts for AWS.



#### Oracle

18 years 6 months

#### Oracle Consulting Sales Senior Director, Retail and Financial Services

Jun 2009 - Jun 2015 · 6 years 1 month

San Francisco Bay Area

Re-vitalized Oracle consulting services for the retail and financial services sector in the west region. Over \$50M in bookings over 4 years. Grew business from ground zero at key accounts to \$5-10M+ annual revenue streams for key accounts. Collaborated with Oracle license team to drive several large license deals in the sector. Forged partnerships with several key SI's to offer a complete services solution for customers.

#### **Consulting Sales Senior Director, Managed Services**

Jun 2007 - Jun 2009 · 2 years 1 month

San Francisco Bay Area

Architected business value proposition, built key execuitive IT relationships and led sale of largest global Oracle Managed Services deals for enterprise companies Alcoa, Vale, Office Depot. Combined bookings value of deals over \$75M. Pioneered full lifecycle managed services offering for Oracle Consulting services.

#### **Consulting Portfolio Senior Director**

Jun 2005 - Jun 2007 · 2 years 1 month

San Francisco Bay Area

Managed consulting delivery and P&L across several hi-tech accounts. Grew services business from a few 100K per year to several million per year at several accounts including Apple and Cisco.

#### **Consulting Delivery Director**

Jun 2002 - Jun 2005 · 3 years 1 month

San Francisco Bay Area





#### Program Manager, Product Development, Oracle McKinsey JV - CORA

Jun 2000 - Jun 2002 · 2 years 1 month

San Francisco Bay Area

Program Manager Product Development at Oracle-McKinsey Joint Venture to develop advanced procurement software. Managed release 1.0 of product in the US and then led transition offshore for product development organization. Pioneered setup of Oracle North America's offshore consulting organization in India.

#### **Project Technical Manager**

Jun 1999 - Jun 2000 · 1 year 1 month

San Francisco Bay Area

Delivered various projects as middleware architect, project manager and lead developer on various custom development projects. Part of team pioneering development of Oracle's Architecture and Blueprint methodology and supporting industry specific intellectual collateral to deliver transformational roadmaps for Oracle customers.

#### **Delivery Consultant - Various Projects**

Jan 1997 - Jun 1999 · 2 years 6 months

San Francisco Bay Area

Delivered various projects as tech lead and lead developer on various custom development projects for consulting.

## Languages

English

-

Hindi

\_

## More activity by Gunja







they found themselves with a lot of work to do. Not only did they have to split off from their previous owners, but they also required a full digital transformation of people, process, and technology focused on their customer needs.

Damon Venger spearheaded this massive digital transformation project to success.

In order to achieve the business results we expected, our Digital Transformation initiatives followed a customer-centric approach across people...

Liked by Gunja Gargeshwari



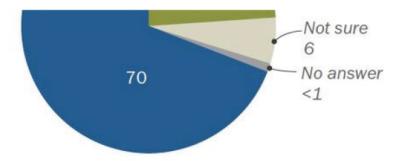
Our partnership with Amazon Web Services (AWS) has been instrumental in supporting our GenAl journey. During our recent meeting with AWS... Liked by Gunja Gargeshwari





Have you tried https://storist.me/ yet? We will be using this platform to quickly digest an amazing book to discuss among an international audience....

Liked by Gunja Gargeshwari



Among those who have heard of AI, % who say that as companies use AI to collect and analyze personal information, this information **will** be used in ways that ...

Al has a trust problem. According to Pew Research Center, most Americans who have heard of Al don't trust companies to use it responsibly and say...

Liked by Gunja Gargeshwari





For those seeking a great Enterprise AE opportunity this maybe a great fit for you. Aaron is a true pro seeking talented persons with SaaS experience.

Liked by Gunja Gargeshwari



I had a great time reflecting on my personal journey with Aspire on their podcast series, #CFOTalks - happy to share that my episode is...

Liked by Gunja Gargeshwari



Fantastic listen for everyone interested to learn what happens on the inside of angel groups and the minds of angel investors....thank you...

Liked by Gunja Gargeshwari

Super excited to announce that I'm the latest tribe member at @Yellow.ai, the World's 1st Enterprise-Grade Conversational AI Platform

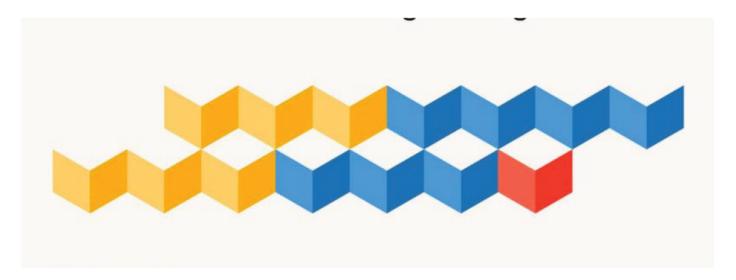
Liked by Gunja Gargeshwari





Get Ready to Uncover the Secrets of Web Data Scraping at Bright Data's Mega Virtual Event This is for each and everyone who is anyways responsible...

Liked by Gunja Gargeshwari



Let's demystify LLM serving on GPUs! Here we did a thorough analysis of latency/throughput tradeoffs, time to first tok, relationship to model size... Liked by Gunja Gargeshwari





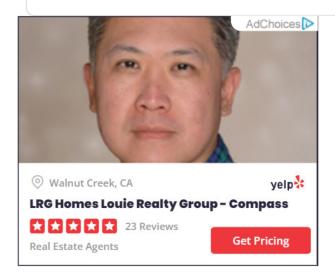
Happy birthday 🥙 Freshworks !

Liked by Gunja Gargeshwari

## View Gunja's full profile

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- **G**et introduced
- **&** Contact Gunja directly

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Director of Key Accounts at Bright Data

New York, NY



#### Yair Ida

VP of SaaS Sales | Enterprise Growth at Bright Data

Israel



#### **Hadar Danino Zimring**

Strategic Program & Operations Executive | Multi-Disciplinary Experience | Solution & Efficiency Focused Israel



#### Or Lenchner

CEO at Bright Data - Keeping public web data, public.

Netanya



#### **Tamir Roter**

Chief Corporate Development Officer at Bright Data

Israel



#### **Amit Shankar**

Account Manager - INDIA at Brightdata

Delhi, India



#### David El Kaim

Enterprise Sales Account Executive France & Benelux

Israel



#### Mark Granot







#### Benjamen Segal

Senior Sales Director @ Bright Data | Driving Business Growth

New York, NY



#### Michelle Beasley

Data Management Specialist at Google

Oakland, CA



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Google Cloud Professional Cloud Architect Cert Prep: 4 Analyzing and Optimizing Technical and Business Processes



Securing Software as a Service (SaaS)

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#### Gunja Gargeshwari

Chief Revenue Officer (CRO) Bright Data



Chief Revenue Officer (CRO) at Bright Data

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Linked in © 2023 About

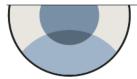
Accessibility User Agreement

Privacy Policy Your California Privacy Choices

Cookie Policy Copyright Policy

Brand Policy Guest Controls

Community Guidelines Language 🕶



#### Jakub Glodek

Presales Leader @ Bright Data
Walnut Creek, California, United States
3K followers 500+ connections



See your mutual connections

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**Bright Data** 



**University of San Francisco** 



Company Website 2

## Activity



Hey Jakarta CX Friends. I am heading to your town. Feel free to ping me and maybe we can catch up. Always love to catch familiar faces and meet new...

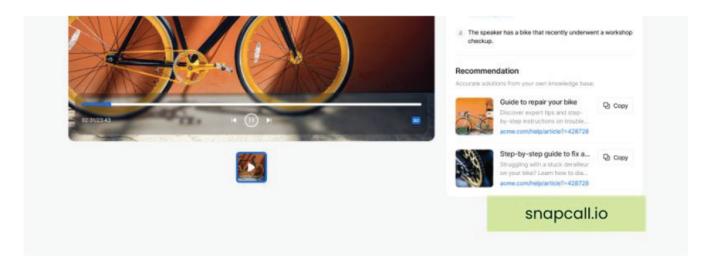
Liked by Jakub Glodek

https://www.linkedin.com/in/jglodek



Do you want to hear the full story of how I took Zendesk to market in Brazil? It all started with a Salesforce report... Comment of you want to...

Liked by Jakub Glodek



Hey folks! We are thrilled to spotlight SnapCall is at the heart of the video support surge in customer service! 

With 94% of folks loving video...

Liked by Jakub Glodek

Join now to see all activity

## Experience



Jun 2023 - Present5 months

Walnut Creek, California, United States



## **Z** Zendesk

11 years 10 months

## Sr. Director, Solutions Consulting, Emerging **Technologies**

Jun 2021 - Jun 20232 years 1 month

Walnut Creek, California, United States

Responsible for the development and management of the Solutions Consulting organization and strategy for acquired products and strategic initiatives. Currently supporting Zendesk AI/ML and Sunshine Conversations.

## **Director, Solutions Consulting, Emerging Products**

Jan 2020 - May 20211 year 5 months

San Francisco Bay Area

Responsible for the development and management of the Solutions Consulting organization and strategy for acquired products and strategic initiatives. Currently supporting Sunshine Conversations and Sell.

## **Principal Solutions Consultant, Zendesk Sell**

Jan 2019 - Dec 20191 year

San Francisco Bay Area

Responsible for all things technical in the Zendesk Sell sales cycle.

# Senior Product Enablement Manager, Zendesk Chat

Apr 2017 - Dec 20181 year 9 months

San Francisco Bay Area

Focusing on supporting Sales, Product, and Operations of the Zendesk Chat product.

### **Senior Solution Consultant**

Oct 2012 - Mar 20174 years 6 months

San Francisco Bay Area

As a Solution Consultant for Zendesk, I am responsible for all technical, solution, and competitive aspects of the Zendesk sales cycle. I focus on making sure that Zendesk fits into an organization and that the technical aspects of the product, to include APIs, integrations, and customizations, are all properly understood by the customer. I regularly sell to Enterprise and Mid Market executives and assist them in convincing C-level and director level executives of the technical merits of...

Show more ~

## **Customer Advocate, Level 2**

Sep 2011 - Sep 20121 year 1 month

San Francisco Bay Area

Provide exceptional customer service to advance issues of Zendesk, a cloud-based ticketing solution.

- Responsible for troubleshooting and solving issues that are elevated to the second level of support.
- Provide support to Strategic Accounts by being the go to person for issues with our top customers.
- Develop and provide training for all new employees in the administration of Zendesk.
- Document troubleshooting steps and provide replication techniques for...

Show more ~



## **IT Support Engineer**

Murphy, McKay & Associates

Jun 2008 - Sep 20113 years 4 months Lafayette, CA



## **Communications Specialist**

**US Army** 

Jan 2001 - Jan 20098 years 1 month



## Patient Care Assistant

University of California, San Francisco

Jan 2003 - Jun 20085 years 6 months

#### Education



## **University of San Francisco**

Bachelor of ArtsPolitics, Minor in Legal Studies

2005 - 2007

Activities and Societies: Army ROTC, McCarthy Center



## City College of San Francisco

**AATransfer Studies** 

2003 - 2005

#### Licenses & Certifications



## Zendesk Accelerate Leadership Program 2020-2021

**UC Berkeley Executive Education** 

Issued Mar 2021

Credential ID 30185919

See credential 2

## Languages

## **Polish**

Native or bilingual proficiency

## **English**

Native or bilingual proficiency

## Organizations

## Polish Club, Inc.

Vice President, Board Member

2003 - Present

## St. Stanislaus Benevolent Society, Inc.

## Secretary

2003 - Present

#### Recommendations received



### 👸 Dustin Laun

"Jakub is one the most top notch technology strategist I've worked with. We had the great opportunity to help bring Zendesk into the Federal government. Jakub's knowledge of the industry and product immediately let me know I had a trusted advisor and was making the right choice. He really knows how to represent his company and industry. On top of it all, Jakub is just a wonderful human and I'm happy to call him a friend. Anyone would be fortunate to have Jakub on their team and would highly benefit from a conversation."



#### Christina Trifero

"Jakub continued to impress me with his wide range of knowledge about the product, and willingness to help clients and think outside the box. He was responsive to my requests, which was so helpful when things were often moving very quickly. I enjoyed his team spirit and his passion for the product made it easy to pair up with him and help educate clients on Zendesk."

## 12 people have recommended Jakub

Join now to view

## More activity by Jakub



Intrigue filled the chef's tables at dinner last week at GIRL & THE GOAT CHICAGO, and the excitement from the #ZendeskShowcase was palpable. Great...

Liked by Jakub Glodek



We're proud of Vince Mahan's efforts serving as Lead Quality Assurance Engineer for Chorus! In fact, mabl tapped Vince to speak about "Unleashing...

Liked by Jakub Glodek



Go big. Or go home. Liked by Jakub Glodek



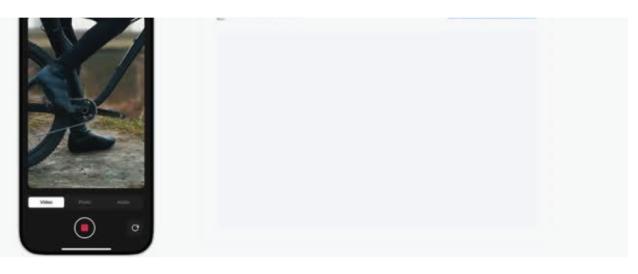
Years ago, I would sit in the audience of events like Technori, Saastr and Growth Hackers summits, wide-eyed and soaking in every word from tech and...

Liked by Jakub Glodek



Black Friday is coming, and it's expected to be busier than ever. **Last year**, **nearly 90** million people shopped...

Liked by Jakub Glodek



Transform your customer support experience with SnapCall! Dive into a world where issues are visualized, understood, and resolved effortlessly...

Liked by Jakub Glodek



Bad demo: - This is our product - This is how it works - This is why you should buy it Good demo: - This is your problem - These are the...

Liked by Jakub Glodek



Join Zendesk at Ada Interact in San Francisco on Nov. 14 and 15! Hear from Vice President of Customer Experience, Strategy and Innovation Shawn...

Liked by Jakub Glodek



I'm excited to share that I've been promoted to COO at Digital Diagnostics! Early in my career I got the great advice to look around me and pay...

Liked by Jakub Glodek



Xebia's presence and expansion in the Americas is a top strategic priority, and Hemant Ramnani – well-known sales & technology executive – will now...

Liked by Jakub Glodek



今回の発表は驚きの発表の連続でした。会場にお集まりいただいた600名以上の皆様の中でも、Zendeskユーザーの方々から「やめようかと思っていたけど新しい未来を見た」「もっと使ってみようと思った」という、Zendesk起死回生の評価をいただきました。Zendeskがいかに日本市場を重視しているかをお…

Liked by Jakub Glodek

# View Jakub's full profile

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- & Contact Jakub directly

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Ilya Link
Data Quality Engineer at Brightdata
San Francisco Bay Area
1K followers 500+ connections



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#### **About**

I am a multilingual professional with experience in language proficiency, crisis management, and a background in front-end and back-end development as a side hustle. My strong communication and leadership skills, combined with my technical background and experience in project management, make me a valuable addition to any project team. I have successfully delivered

projects in the past and am able to manage teams through challenging situations.

#### Activity



● Hello from the Global Digital Conference in Beijing! Our Bright Data team is here, joining the digital revolution and driving innovation. 

Liked by Ilya Link



Hello folks! Big change on my end. Recently I decided to move on from Zendesk after almost 12 years of massive growth, both personally and company...

Liked by Ilya Link



Wow! this venture is shaping up nicely. We manage to onboard clients, build marketing departments for them and most importantly, bring results in 3... Liked by Ilya Link

Join now to see all activity

# Experience



# **Bright Data**

4 years 11 months

# **Data Quality Engineer**

Jan 2023 - Present10 months

Netanya, Center District, Israel

# **Technical Expert**

Oct 2019 - Jan 20233 years 4 months

Netanya Area, Israel

- Data Expert, covered tech part of the deals
- Managed software development process

# Senior Support Manager

Jun 2019 - Sep 20194 months

Netanya, Central, Israel

- Onboarded new support managers
- Worked on work-flow improvements

# Support Manager CN Market

Dec 2018 - May 20196 months

Netanya, Central, Israel

I was the first CN-speaking support manager in the team

- Implemented new communication channels
- Improved documentation for CN customers
- Worked on features for current solutions to technically-localize it



# **AMULEX**

10 months

# Lead Project Manager

Feb 2018 - Aug 20187 months

- Leaded team of 13 people (Front/Back-end devs, testers, designer, analyst)
- Implemented agile methodology to development process
- Leaded full product lifecycle

# **Project Manager**

Nov 2017 - Feb 20184 months

- Performed market research
- Worked on products road mapping
- Formulated financial propositions to chief management
- Leaded sales presentations



# **Management Intern**

#### Gemsense

Mar 2017 - Oct 20178 months

Haifa Area, Israel

- Market research and analysis, looked for potential investors in the field
- Found and brought to Israel 2 delegations, from China and Taiwan



# Front-End Developer

Bauman Moscow State Technical University

Sep 2013 - Jul 201411 months

#### Education



# 同济大学

Master's degreeControl Theory

2014 - 2017

- Got full government scholarship
- Main thesis topic was "Decentralized System of Interaction between Smart Devices in Smart House"
- Leaded Russian students association, won multiple

https://www.linkedin.com/in/linkilya

## students competition

- All classes were in Chinese language only
- Graduated half of a year earlier due to high score accumulated



# **Bauman Moscow State Technical University**

Master's degreeAutomatic systems of informational management

2010 - 2016

- Main focus of final thesis was "Relative algebra in databases optimization"
- Was a Student Activities committee representative
- Worked in Document Workflow department as Developer
- Initiated Russian-Chinese group on behalf of Association of Sino-Russian Technical Universities

## Volunteer Experience



#### Team Leader

**AIESEC** 

Jul 2012 - Aug 20122 months

## **Economic Empowerment**

A huge international, multicultural project, based in India's poor areas. The project was about bringing the governmental investment focus to poor areas, so lowclass people could afford a better life for themselves. I was a leader of one out of two teams, and my duty was to create new ways of communication between the governmental structures and poor people. We archived our goal, even local newspapers were writing about us. As the result governmental structures brought some workers to area...

Show more ~



#### Coordinator For International Relations

Gici International

Nov 2014 - May 20157 months

**Economic Empowerment** 

I was using my skills in CN communication and cultural understanding to help foreign clients negotiate with CN import\export company about their projects.

**Test Scores** 

HSK 5 (汉语水平考试)

Score: 284

Apr 2015

#### Languages

# Русский

Native or bilingual proficiency

# **English**

Full professional proficiency

# 普通话

Full professional proficiency

#### עברית

Limited working proficiency

#### Recommendations received



**Yair Ida** 

"Ilya Link is a fantastic person to work with. He consistently demonstrated a solid work ethic supporting Brightdata's customers."

1 person has recommended Ilya

Join now to view

More activity by Ilya



Cynet Security Together We Win - Tenerife 2022 what a BLAST! Never stop Running :) Join the ride... https://lnkd.in/dXrRHhrF Cynet Security George...

Liked by Ilya Link



Whenever I do this at work, I get weird looks. I mean, I get it: I'm 36, a fully grown adult, with a perfectly adequate ergonomic desk chair...

Liked by Ilya Link

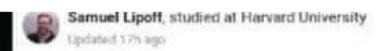


January was my last month at Brightdata after almost 7 years. I want to thank everyone for this wonderful and exciting journey. I had the opportunity... Liked by Ilya Link



Two years ago we started the journey of building a US #team. This is a company-wide effort to #recruit, train #new\_employees, provide the...

Liked by Ilya Link



Сложная задача. Ей может быть 42, но также может быть 41 или 43, ведь в условии не говорится, когда у них дни рождения. Также ее может уже не быть в живых. Наконец, вы могли думать, что она ваша сестра, а на самом деле у

#### Тестировщики...

Liked by Ilya Link

# View Ilya's full profile

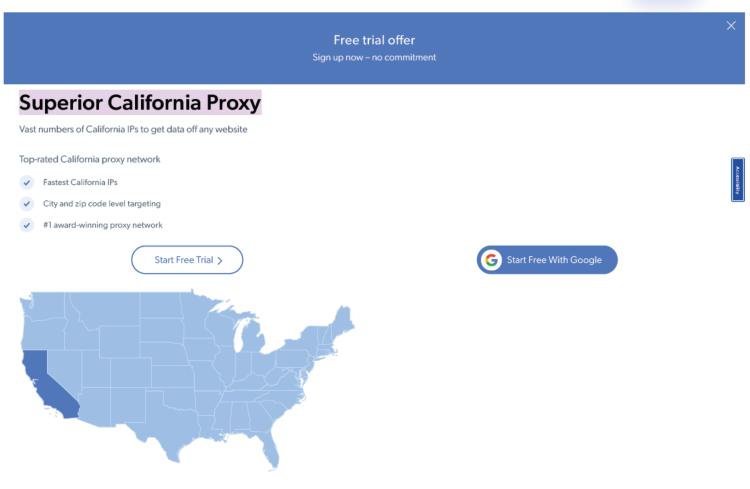
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**&** Contact Ilya directly

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# EXHIBIT D





#### Resilient California proxies, shared by millions of real Californians

Bright Data's California Proxies consist of Residential proxies, Mobile proxies, ISP proxies, and Datacenter Proxy Networks providing versatility of coverage that ensures your ability to unlock any public websites and collect data at scale without facing restrictions by geolocation. Overcome all blocks all of the time in California with the best-performing proxies in the industry: 99.99% network uptime, 99.99% success rates, unlimited concurrent requests, the fastest speeds and overall #1 award-winning quality of service.

Start free trial >





Leverage IPs based in California to extract public web data from California websites, to perform essential business needs like website testing, ad verification, product matching, and pricing comparison. Overcome all blocks in California, all of the time with 24/7 global customer support & a dedicated account manager, with excellent response times.

Getting started is easy – Minimum in-house resources needed, and no-hassle integration for first-timers.

Start free trial >



Over 20,000+ businesses are currently using Bright Data proxy service for:

Collecting stock market information

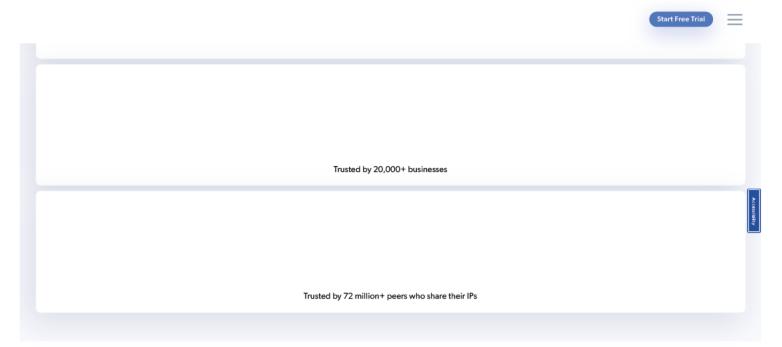
Protecting their brand

Getting eCommerce competitive data

Performing web data extraction

Start free trial >

# Why Customers Choose Bright Data California IPs #1 Performing California Proxy

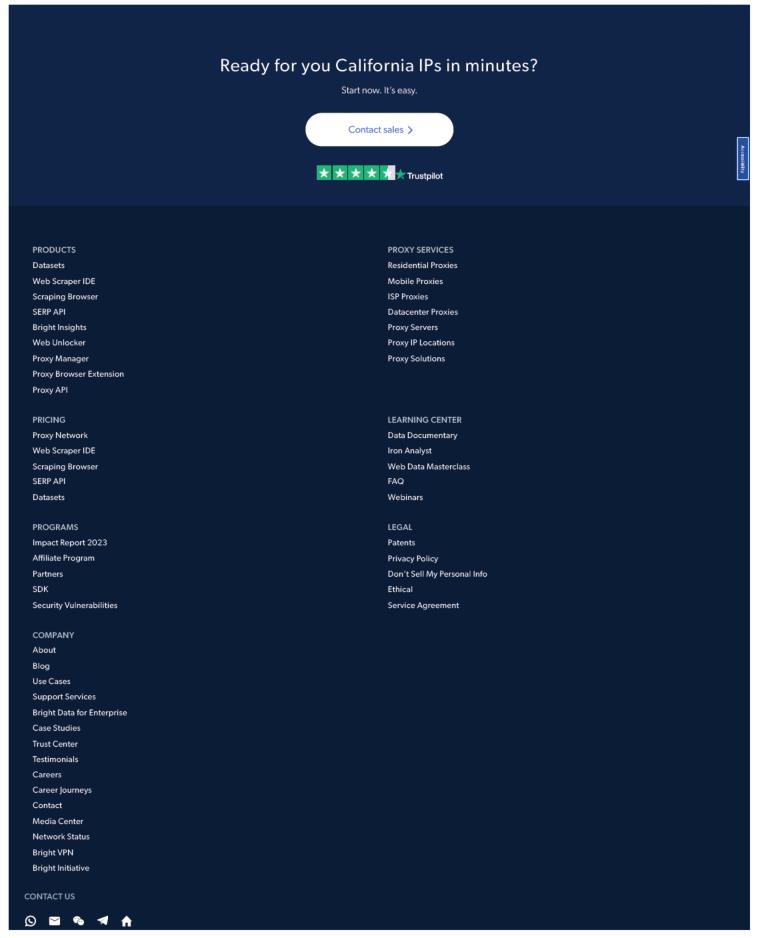


#### Patented, industry-leading California Proxies

Any IP Type  Easily switch between Datacenter, ISP, Residential and Mobile networks.  Learn about IP types
Global Distribution  Need IPs outside California too? Find IPs in every country, city, ASN, and carrier  See IP locations
Exclusive IPs  Use IPs assigned exclusively for your target websites.  Learn About IP Exclusivity.
Fastest Uptime 99.99% Network Uptime, plus a real-time network status monitor
Attuned Customer Support The industry standard in 24/7 support
Proxy Manager  Speed up your project with a free Proxies Manager

Start free trial > Proxy types for every need **Residential Proxies** ✓ 72,000,000+ IPs Available in 195 countries The largest rotating real-peer IP network ✓ Access & crawl all sophisticated websites Residential Proxies > **Datacenter Proxies** √ 770,000+ IPs ✓ Available in 98 countries ✓ Shared and dedicated IP pools available Quick access to non-complex websites Datacenter Proxies > **ISP Proxies** ✓ 700,000+ IPs Available in 35 countries Real static residential IPs without IP rotation Best for logging into multiple accounts ISP Proxies > **Mobile Proxies** ✓ 7,000,000+ IPs ✓ Available in 195 countries ✓ Largest real-peer 3G/4G IP network in the world ✓ Verify mobile ads & crawl mobile sites





bright data







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Bright Data Ltd. (Headquarters), 4 Hamahshev St., Netanya 4250714, Israel (POB 8025) 229 W 36th St., New York, NY 10018, United States.

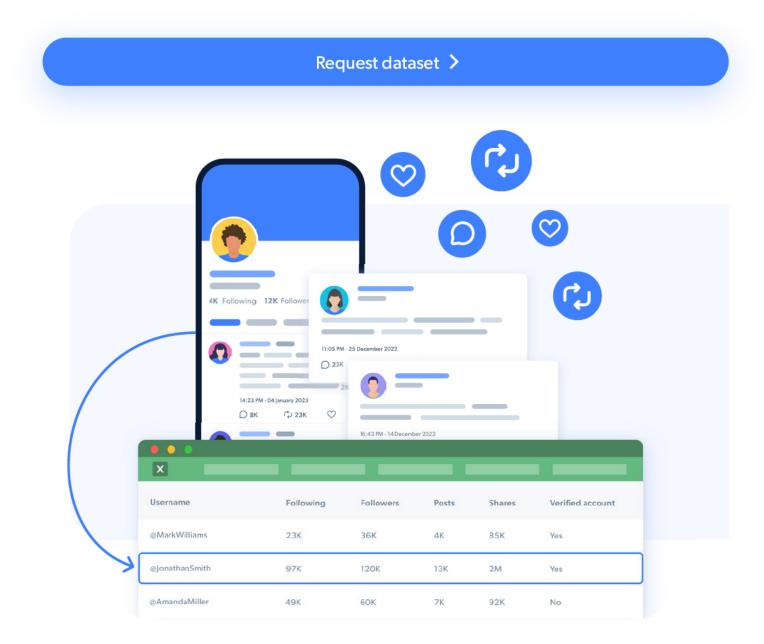


# EXHIBIT E



# **Twitter Datasets**

Tap into Twitter public accounts with Bright Data's Twitter dataset. Use innovative filtering capabilities to monitor sentiment, identify trends, or locate the right influencers, it's really up to you.

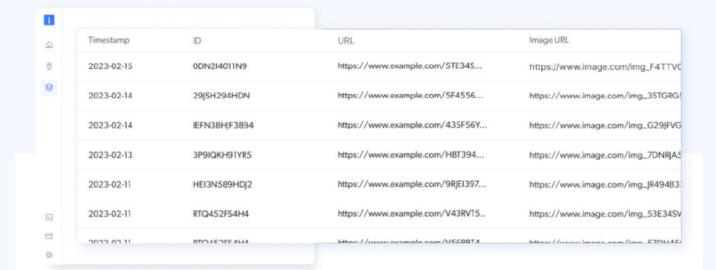


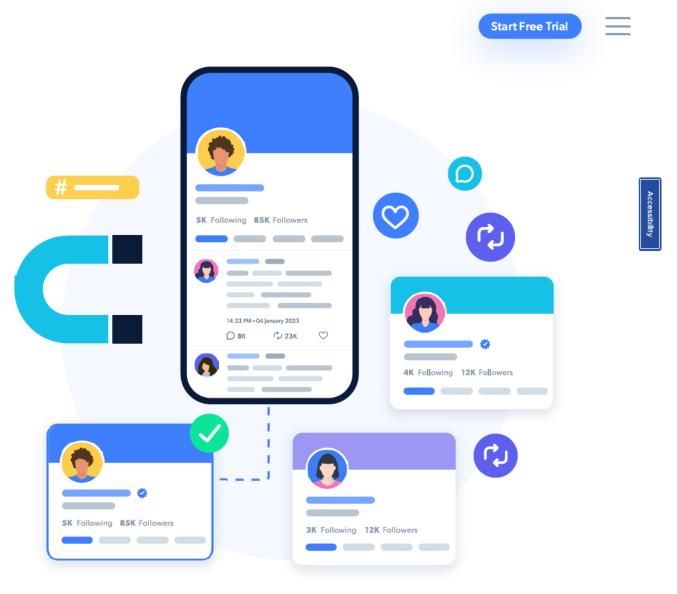
**Forbes** 

**VB** 

#### **Twitter Datasets**

Added and enriched data points on top of the data extracted from Twitter may include: # of followers, verified, account type, links, bio, brand affiliation, posts, images, tweets, shares, location, hashtags, and much more.





#### Locate the Right Twitter Influencers

Find Twitter influencers with high social impact by using our Twitter datasets to analyze engagement, brand affiliation, followers, etc. Collaborate with those who can promote your brand most effectively.

Request dataset

#### Monitor brand reputation and consumer sentiment

# Request dataset





#### Discover new trends and opportunities

Find companies, professionals, new market opportunities, trending products, and what your competitors are doing about it.

Request dataset

#### **Dataset Features**

Get easy to use, well-structured datasets for any use case

#### Structure maintenance

Datasets are maintained based on website structure changes

#### **Custom output fields**

Define custom output fields to meet specific business requirements

#### 24/7 support

We provide assistance to our customers whenever they need it

#### Subscription

Data feed of new/updated records, based on a predefined schedule

Amazon 55, Google Cloud Pubbub, 5FTF, and MICROSOTT AZUIE.

#### Different file output formats

Datasets in the format of JSON, ndJSON, CSV, or Excel

#### **Dedicated account manager**

Management of your data collection by a dedicated account manager

#### **Data Scaling**

Define servers to handle large amount of data requests

#### Data quality assurance

#### We'll provide the data while you focus on the rest



#### **Easy Discovery**

Tap into all data points available on a website, which can be very challenging to discover when collecting yourself.



#### **Accurate and Complete**

Get fresh, precise, and complete datasets, covering millions of pages and tens of millions of data points.



#### **Enriched Data**

Increase the value and usability of your dataset by integrating multiple data sources to create a valuable enriched dataset.



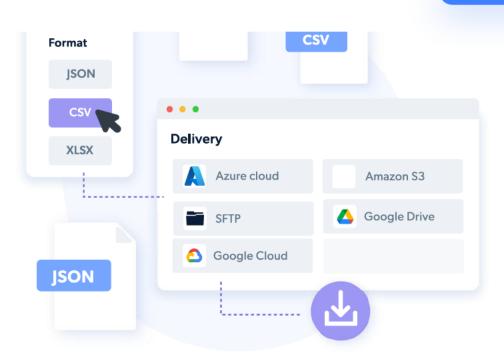
#### **Leaders in Compliance**

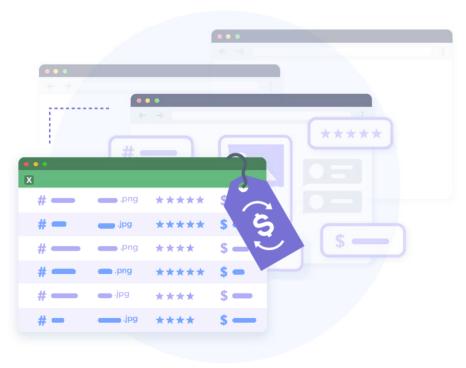
Bright Data is fully committed to complying with all relevant data protection legal requirements, including GDPR and CCPA.

#### **Various Formats**

Datasets in JSON, ndJSON, CSV, or XLSX will be delivered to your preferred storage.

Delivery methods include: AWS, Google Drive, Google Cloud Storage, SFTP, and more!

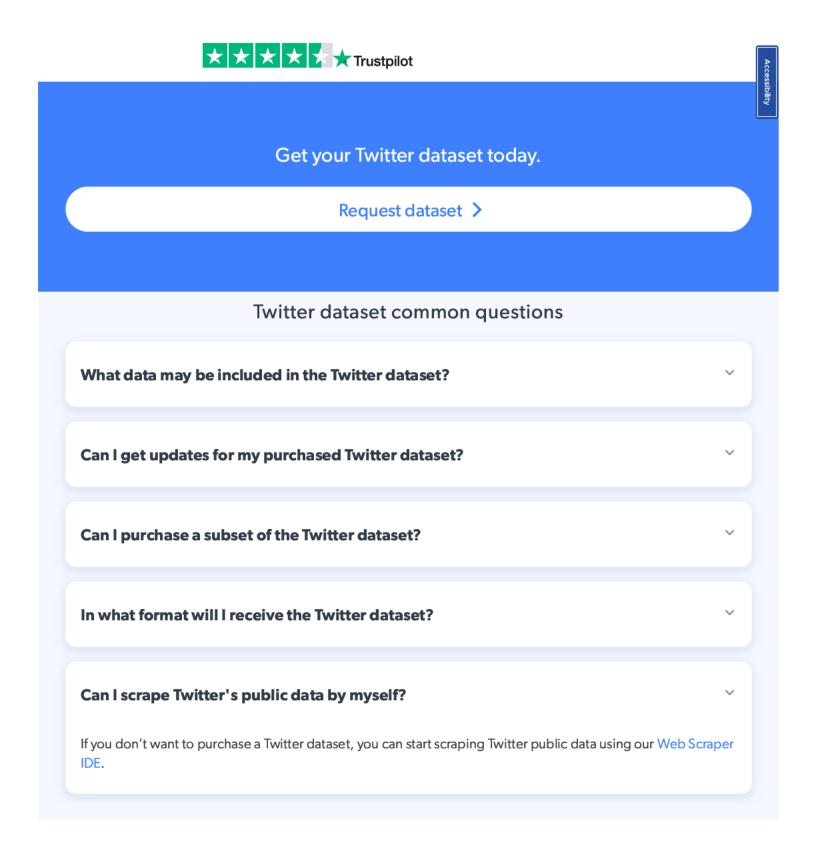




#### Flexible Pricing

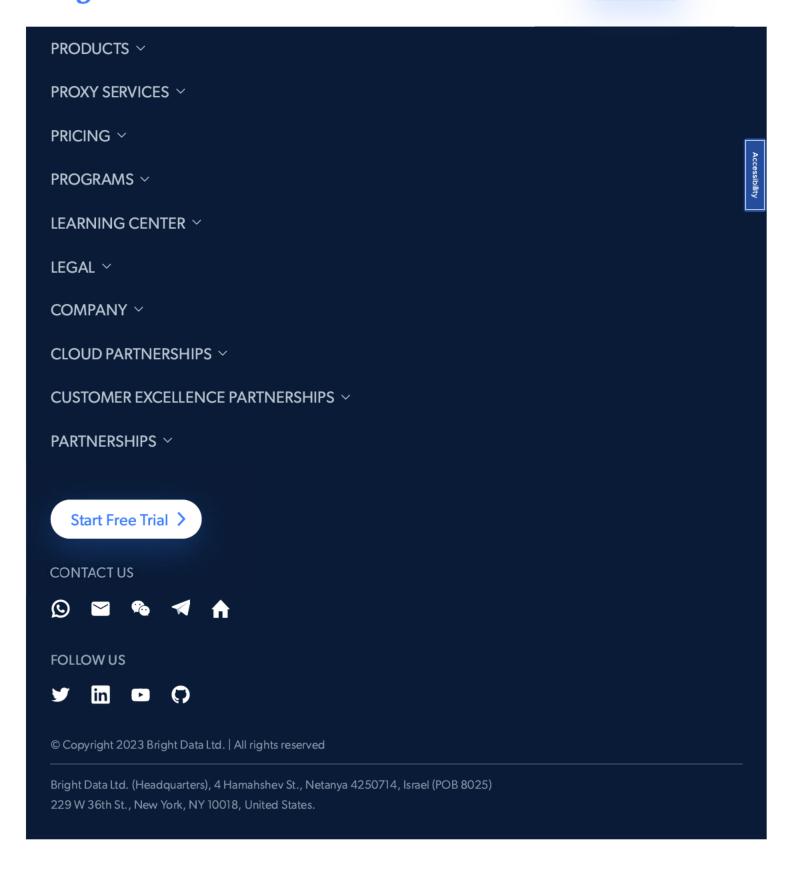
Send us your requirements and we'll provide you with a quote for your requested dataset.

• Price starts from \$0.001/record

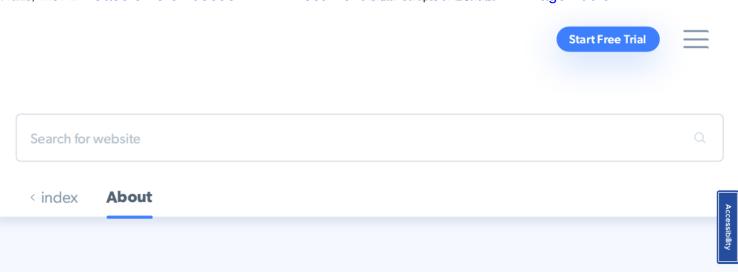


# bright data

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# **EXHIBIT F**



# **Twitter Scraper**

Scrape Twitter and scrape data such from public Twitter profiles. Collect data on URLs, hashtags, images, videos, tweets, retweets, conversation threads, followers/following, locations, and more.

Start Free Trial >



Use Bright Data's Web Scraper IDE,

#### Twitter Scraper use cases

Scrape Twitter to monitor consumer sentiment

Find new influencers and monitor shifts in popularity

Protect your brand image by capturing users' conversations

Easily stay on top of new trending topics

#### **Twitter Scraper Overview**

- Easy data scraping for beginners
- Utilizes proprietary technology to unlock sites
- Infinitely scalable collect as much data as you need quickly and completely
- Fully compliant with industry best practices and privacy regulations (GDPR, CCPA)

Start Free Trial >

# ccessibility

### **Twitter profile**

Collect profile data by profile URL

#### **Twitter tweets**

Collect tweets by tweet URL

#### Twitter keyword or hashtag

Collect tweets by keyword or #hashtag - DEMO

# Twitter keyword or hashtag

#### Sample Input

search

#love

```
"id_str": "1417746521731133443",
    "full_text": "All my heart to this movie > > > #love #selfcare
#WEALLHUMAN https:\/\/t.co\/m1lwyJNGF4",
    "truncated": false,
    "source": "\u003Ca
href=\u0022http:\/\twitter.com\/download\/iphone\u0022
rel=\u0022nofollow\u0022\u003ETwitter for iPhone\u003C\/a\u003E",
    "in_reply_to_status_id": null,
    "in_reply_to_status_id_str": null,
    "in_reply_to_user_id": null,
    "in_reply_to_user_id_str": null,
    "in_reply_to_screen_name": null,
    "user_id_str": "1414891075982880770",
    "geo": null,
    "coordinates": null,
    "contributors": null,
```

# Twitter profile

#### Sample Input

url

https://twitter.com/billieeilish

number\_of\_tweets

70

```
=
```

```
"isVerified": true,
    "bio": "Newton is a very handsome boy.",
    "location": "California, USA",
    "following": 2067,
    "followers": 17192867,
    "website_url": "http:\/\/spotify.link\/NetflixHub",
    "posts": 43328,
    "media_count": 10778,
    "profile_background_image_url":
    "https:\/\/pbs.twimg.com\/profile_banners\/16573941\/1648216530",
        "profile_image_url":
    "https:\/\/pbs.twimg.com\/profile_images\/1235992718171467776\/PaX2Bz1S_nor
        "created": "Fri Oct 03 04:16:17 +0000 2008",
        "handle": "netflix",
        "collected_number_of_posts": 20,
```

#### Twitter tweets

#### **Sample Input**

url

https://twitter.com/billieeilish/status/1288974168399069185

```
'1448695234561380352'
   ],
    "post url":
"https:\/\/twitter.com\/NYUABetterTech\/status\/1448695234561380352",
    "post_text": "Happening now! Join @NaDomagala, @maria_axente, Dave
Tarrant, Olivia Gambelin and hear responsible technology professionals from
different sectors sharing what skills they have found the most useful when
working in technology and data ethics.",
    "post_time": "Thu Oct 14 17:00:34 +0000 2021",
    "retweets": 0,
    "comments": 0,
    "likes": 1,
    "status": "Ok"
```

## **Web Scraper IDE Features**

Leave your scraping limitations behind with our hosted cloud solution

#### Pre-made web scraper templates

Get started quickly and adapt existing code to your specific needs

Start Free Trial

vvatch your code as you build it and debug errors in your code quickly

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Capture browser network calls, configure a proxy, extract data from lazy loading UI, and more!

#### Easy parser creation

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#### **Auto-scaling infrastructure**

You don't need to invest in the hardware or software to manage an enterprise-grade web scraper

#### Integration

Emulate a user in any geo-location with built-in fingerprinting, automated retries, CAPTCHA solving, and more.

#### **Built-in debug tools**

Trigger crawls on a schedule or by API, and connect our API to major storage platforms

# Leverage Twitter Scraper for the following uses:

• Get a leg up on upcoming trends, predict the next fads and fashions, and keep track of consumer sentiment

· Learn about your competitors and their customers to gain insights and advantage



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Everything you need from a web scraping solution

Browse Bright Data's directories

A B C D E E G H I J K L M N Q P Q R S I U V W X Y Z 2

### Want to learn more?

Talk to an expert to discuss your data collection needs and see our platform in action.

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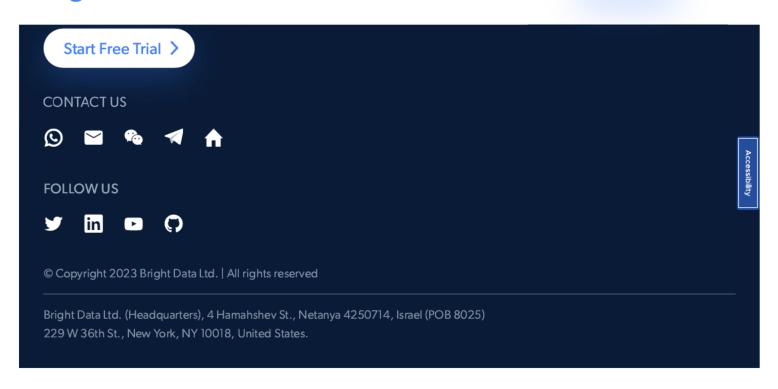
**COMPANY** ~

**CLOUD PARTNERSHIPS** ~

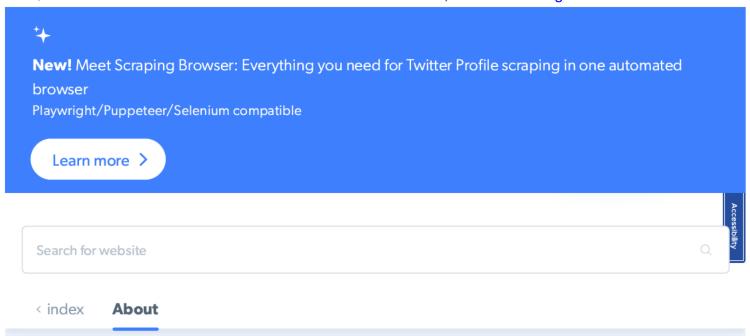
CUSTOMER EXCELLENCE PARTNERSHIPS ~







# EXHIBIT G



# **Twitter Profile Scraper**

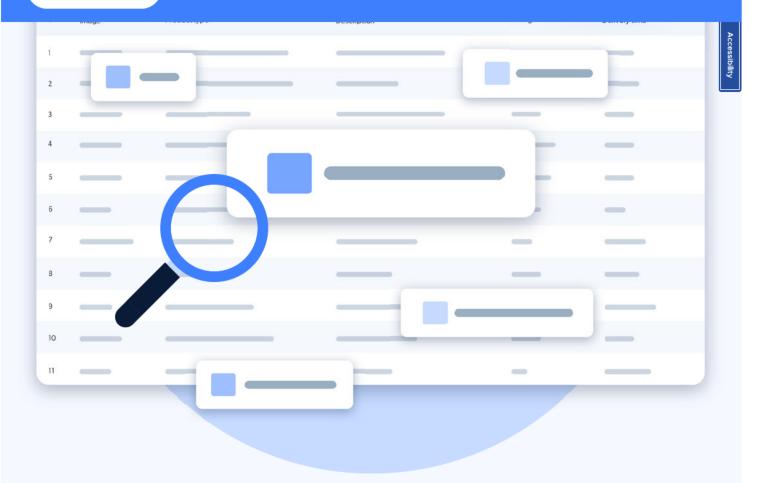
Scrape Twitter profiles (public) and collect data such as user name, display name, likes, tweets and retweets, replies, location, Twitter handle, following/followers, URL, date of creation, and more.

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Playwright/Puppeteer/Selenium compatible

Learn more >



Use Bright Data's <u>Web Scraper IDE</u>, or purchase a Twitter dataset



Playwright/Puppeteer/Selenium compatible

Learn more >

Scrape Twitter profiles for competitive analysis

Scrape Twitter profiles for influencer marketing

Scrape Twitter profiles for social media marketing

Scrape Twitter profiles for sentiment analysis

### **Twitter Profile Scraper Overview**

- Easy data scraping for beginners
- ✓ All-in-One platform integrates with our industry-leading proxies
- Utilizes proprietary technology to unlock sites
- Infinitely scalable collect as much data as you need quickly and completely
- Fully compliant with industry best practices and privacy regulations (GDPR, CCPA)

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# Output examples



Playwright/Puppeteer/Selenium compatible

Learn more >

#### Twitter profile

Collect profile data by profile URL

#### **Twitter tweets**

Collect tweets by tweet URL

# Twitter profile

#### **Sample Input**

url

https://twitter.com/billieeilish

number\_of\_tweets

70



Playwright/Puppeteer/Selenium compatible

Learn more >

```
"posts": 43328,
    "media_count": 10778,
    "profile_background_image_url":
    "https:\/\/pbs.twimg.com\/profile_banners\/16573941\/1648216530",
        "profile_image_url":
    "https:\/\/pbs.twimg.com\/profile_images\/1235992718171467776\/PaX2Bz1S_nor
        "created": "Fri Oct 03 04:16:17 +0000 2008",
        "handle": "netflix",
        "collected_number_of_posts": 20,
```

#### **Twitter tweets**

#### **Sample Input**

url

https://twitter.com/billieeilish/status/1288974168399069185



Playwright/Puppeteer/Selenium compatible

Learn more >

```
different sectors sharing what skills they have found the most useful when
working in technology and data ethics.",
    "post_time": "Thu Oct 14 17:00:34 +0000 2021",
    "retweets": 0,
    "comments": 0,
    "likes": 1,
    "status": "Ok"
}
```

# Twitter keyword or hashtag

**Sample Input** 

search

#love



Playwright/Puppeteer/Selenium compatible

Learn more >

```
rel=\u0022nofollow\u0022\u003ETwitter for iPhone\u003(\/a\u003E",
    "in_reply_to_status_id": null,
    "in_reply_to_status_id_str": null,
    "in_reply_to_user_id": null,
    "in_reply_to_user_id_str": null,
    "in_reply_to_screen_name": null,
    "user_id_str": "1414891075982880770",
    "geo": null,
    "coordinates": null,
    "contributors": null,
```

## **Web Scraper IDE Features**

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#### Pre-made web scraper templates

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Playwright/Puppeteer/Selenium compatible

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#### Easy parser creation



Playwright/Puppeteer/Selenium compatible

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Trigger crawls on a schedule or by API, and connect our API to major storage platforms





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# Browse Bright Data's directories

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Playwright/Puppeteer/Selenium compatible



229 W 36th St., New York, NY 10018, United States.

Accessibility

# EXHIBIT H



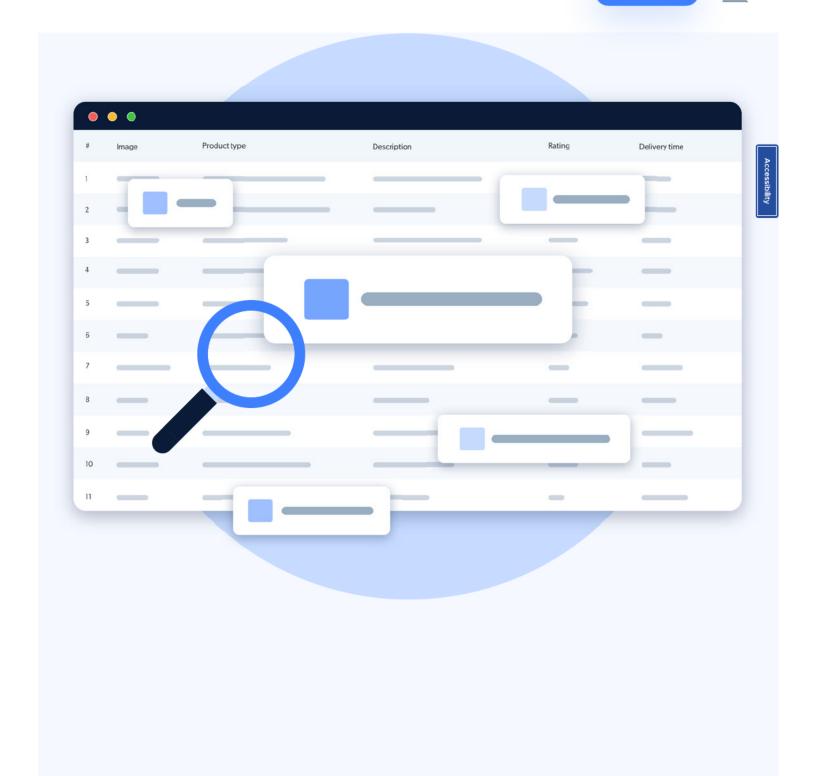
Search for website

# **Twitter Image Scraper**

Scrape Twitter images and collect data such as user name, Twitter handle, following/followers, location, URL, date of creation, and more.

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Start Free Trial



Use Bright Data's Web Scraper IDE, or purchase a Twitter dataset

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## Twitter Image Scraper use cases

Scrape Twitter images for social media monitoring

Scrape Twitter images for brand monitoring

Scrape Twitter images for trend analytics

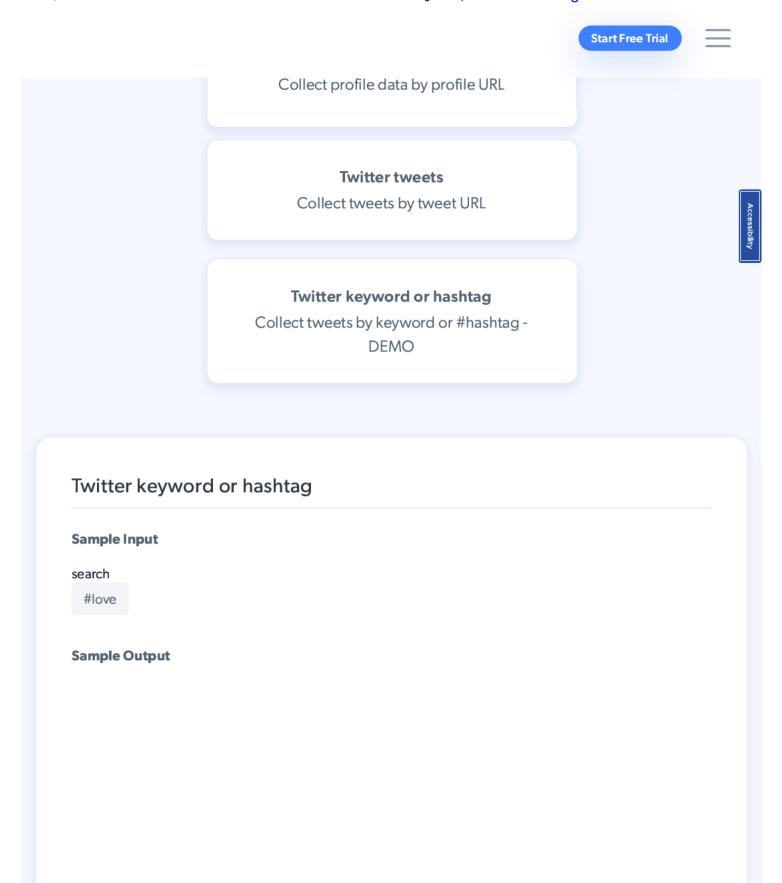
Scrape Twitter images for sentiment analysis

### **Twitter Image Scraper Overview**

- Easy data scraping for beginners
- All-in-One platform integrates with our industry-leading proxies
- Utilizes proprietary technology to unlock sites
- Infinitely scalable collect as much data as you need quickly and completely
- Fully compliant with industry best practices and privacy regulations (GDPR, CCPA)

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# Output examples



```
"id_str": "1417746521731133443",
    "full_text": "All my heart to this movie > > > #love #selfcare
#WEALLHUMAN https:\/\/t.co\/m1lwyJNGF4",
    "truncated": false,
    "source": "\u003Ca
href=\u0022http:\/\twitter.com\/download\/iphone\u0022
rel=\u0022nofollow\u0022\u003ETwitter for iPhone\u003C\/a\u003E",
    "in_reply_to_status_id": null,
    "in_reply_to_status_id_str": null,
    "in_reply_to_user_id": null,
    "in_reply_to_user_id_str": null,
    "in_reply_to_screen_name": null,
    "user_id_str": "1414891075982880770",
    "geo": null,
    "coordinates": null,
    "contributors": null,
```

#### Twitter tweets

#### **Sample Input**

url

https://twitter.com/billieeilish/status/1288974168399069185

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```
'1448695234561380352'
    ],
    "post_url":
"https:\/\/twitter.com\/NYUABetterTech\/status\/1448695234561380352",
    "post_text": "Happening now! Join @NaDomagala, @maria_axente, Dave
Tarrant, Olivia Gambelin and hear responsible technology professionals from
different sectors sharing what skills they have found the most useful when
working in technology and data ethics.",
    "post_time": "Thu Oct 14 17:00:34 +0000 2021",
    "retweets": 0,
    "comments": 0,
    "likes": 1,
    "status": "Ok"
```

# Twitter profile

#### Sample Input

url

https://twitter.com/billieeilish

number\_of\_tweets

70

```
"isVerified": true,
    "bio": "Newton is a very handsome boy.",
    "location": "California, USA",
    "following": 2067,
    "followers": 17192867,
    "website_url": "http:\/\/spotify.link\/NetflixHub",
    "posts": 43328,
    "media_count": 10778,
    "profile_background_image_url":
    "https:\/\/pbs.twimg.com\/profile_banners\/16573941\/1648216530",
        "profile_image_url":
    "https:\/\/pbs.twimg.com\/profile_images\/1235992718171467776\/PaX2Bz1S_nor
        "created": "Fri Oct 03 04:16:17 +0000 2008",
        "handle": "netflix",
        "collected_number_of_posts": 20,
```

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# Browse Bright Data's directories

ABCDEEGHIJKLMNQPQRSIUVWXYZ2

Search for website

Q



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CUSTOMER EXCELLENCE PARTNERSHIPS ~

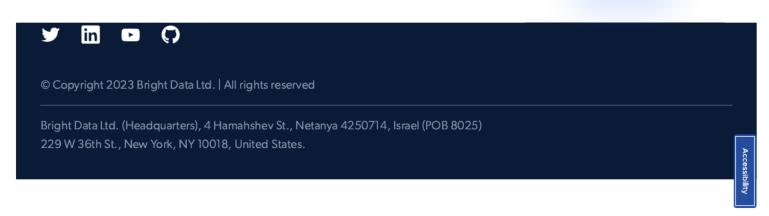
PARTNERSHIPS ~

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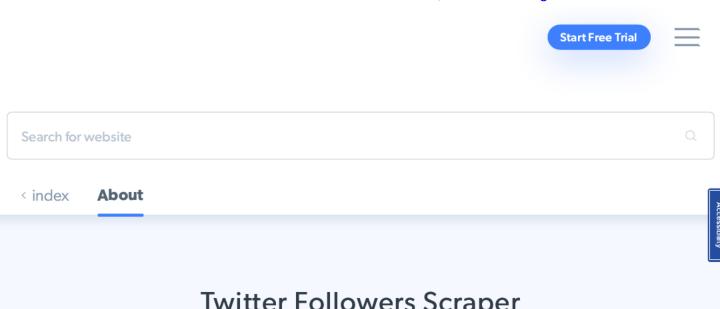
**CONTACT US** 

# **bright** data





# EXHIBIT I



# **Twitter Followers Scraper**

Scrape Twitter followers and collect data such as: name, number of followers, profile URLs, images, company URL, and more.

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Use Bright Data's Web Scraper IDE,

#### Twitter Followers Scraper use cases

Scrape Twitter followers to monitor consumer sentiment

Scrape Twitter followers to find new influencers

Protect your brand image by capturing users' conversations

Easily stay on top of new trending topics

#### **Twitter Followers Scraper Overview**

- Easy data scraping for beginners
- Utilizes proprietary technology to unlock sites
- Infinitely scalable collect as much data as you need quickly and completely
- Fully compliant with industry best practices and privacy regulations (GDPR, CCPA)

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#### **Twitter profile**

Collect profile data by profile URL

#### **Twitter tweets**

Collect tweets by tweet URL

#### Twitter keyword or hashtag

Collect tweets by keyword or #hashtag - DEMO

#### Twitter keyword or hashtag

**Sample Input** 

search

#love

**Sample Output** 

```
"id_str": "1417746521731133443",
    "full_text": "All my heart to this movie > > > #love #selfcare
#WEALLHUMAN https:\/\/t.co\/m1lwyJNGF4",
    "truncated": false,
    "source": "\u003Ca
href=\u0022http:\/\twitter.com\/download\/iphone\u0022
rel=\u0022nofollow\u0022\u003ETwitter for iPhone\u003C\/a\u003E",
    "in_reply_to_status_id": null,
    "in_reply_to_status_id_str": null,
    "in_reply_to_user_id": null,
    "in_reply_to_user_id_str": null,
    "in_reply_to_screen_name": null,
    "user_id_str": "1414891075982880770",
    "geo": null,
    "coordinates": null,
    "contributors": null,
```

#### Twitter profile

#### Sample Input

url

https://twitter.com/billieeilish

number\_of\_tweets

70

#### **Sample Output**

```
"isVerified": true,
    "bio": "Newton is a very handsome boy.",
    "location": "California, USA",
    "following": 2067,
    "followers": 17192867,
    "website_url": "http:\/\/spotify.link\/NetflixHub",
    "posts": 43328,
    "media_count": 10778,
    "profile_background_image_url":
    "https:\/\/pbs.twimg.com\/profile_banners\/16573941\/1648216530",
        "profile_image_url":
    "https:\/\/pbs.twimg.com\/profile_images\/1235992718171467776\/PaX2Bz1S_nor
        "created": "Fri Oct 03 04:16:17 +0000 2008",
        "handle": "netflix",
        "collected_number_of_posts": 20,
```

#### **Twitter tweets**

#### Sample Input

url

https://twitter.com/billieeilish/status/1288974168399069185

#### **Sample Output**

```
"1448695234561380352"

],
    "post_url":
"https:\/\/twitter.com\/NYUABetterTech\/status\/1448695234561380352",
    "post_text": "Happening now! Join @NaDomagala, @maria_axente, Dave
Tarrant, Olivia Gambelin and hear responsible technology professionals from
different sectors sharing what skills they have found the most useful when
working in technology and data ethics.",
    "post_time": "Thu Oct 14 17:00:34 +0000 2021",
    "retweets": 0,
    "comments": 0,
    "likes": 1,
    "status": "Ok"
}
```

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#### **Built-in debug tools**

Trigger crawls on a schedule or by API, and connect our API to major storage platforms

#### How to leverage a Twitter Followers Scraper for your business:

- Target the right populations that are interested in a particular industry or topic
- · Build custom audiences for ad campaigns and to gain more followers for your business

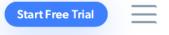
following

 Extract user info like: name, Twitter handle, followers/following, profile, URL/image/banner, location, tweets, retweets, and replies from profiles, hashtags, etc.





Everything you need from a web scraping solution



#### **Browse Bright Data's directories**

#### A B C D E E G H I J K L M N O P Q R S I U V W X Y Z ?

Search for website

#### Want to learn more?

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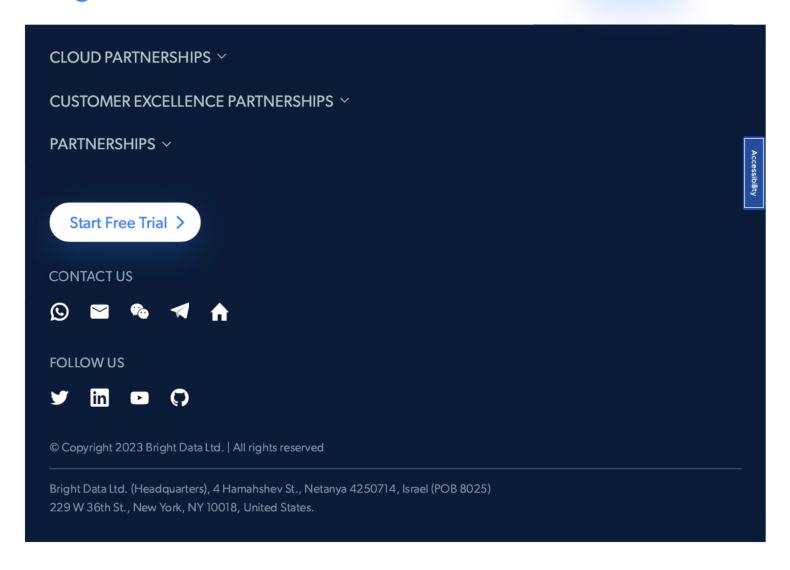
PRICING ~

PROGRAMS ~

LEARNING CENTER ~







# EXHIBIT J



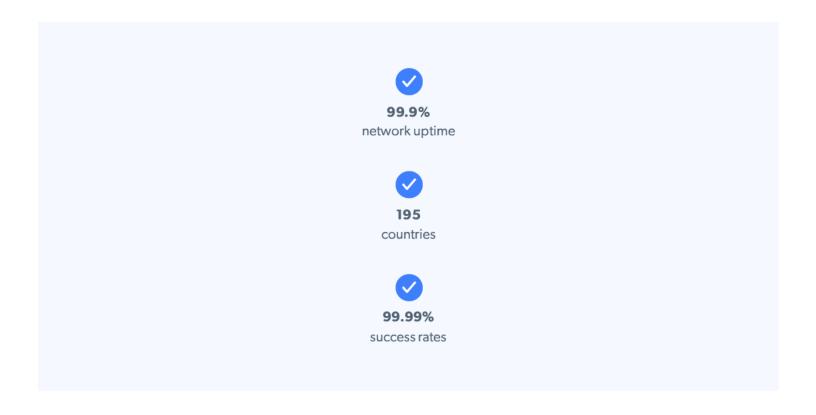
### **Proxy services** for every use case

Use the industry's most advanced proxy infrastructure for any specific business need

- Bypass any location restriction with proxies from every country in the world
- The best proxy performance in the world
- GDPR & CCPA compliant

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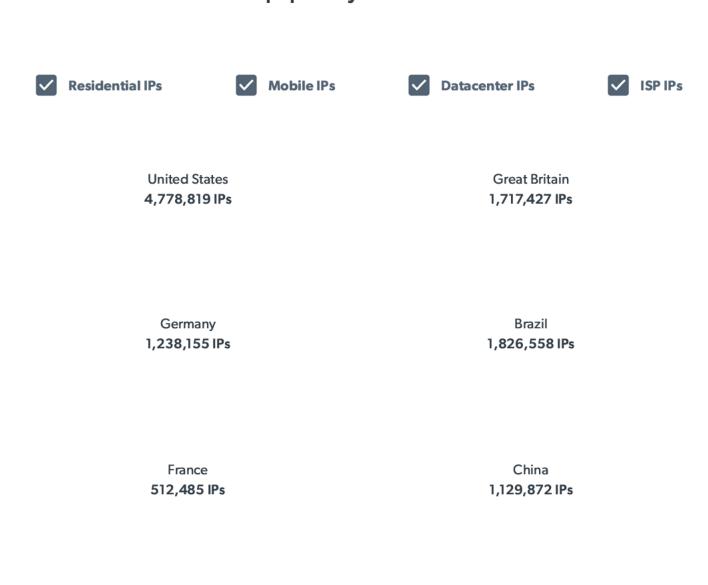








# Top proxy locations



Canada

536,433 IPs

Spain

595,372 IPs

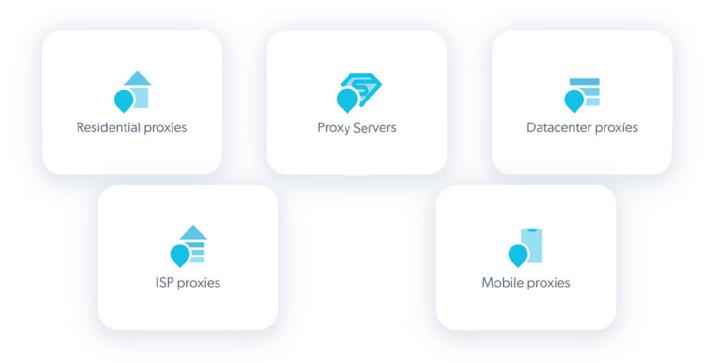
Russia **3,304,575 IPs** 

Japan 291,372 lPs

South Korea 228,171 IPs

India 5,127,785 IPs

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#### **RESIDENTIAL PROXIES**

The world's #1 Residential Proxy Network enables you to access any website content regardless of location, while avoiding IP bans and CAPTCHAs. Bright Data's Residential Proxies provide the most comprehensive geographic coverage, covering 195 locations including country and city-level website targeting. With 72 million+ real IPs, shared by real people in our communitysharing network, the Residential Network enables you to scale your data collection projects with the highest speeds and success rates.



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#### Residential proxies >





For optimized performance and the fastest response times, leverage Bright Data Super Proxy Servers located across the globe. Super proxies have efficient traffic ratios and a network that can handle huge fluctuations in traffic with increased speeds because of their size and locations.

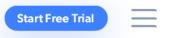
Broadest geographic coverage



The industry's best-performing Super Proxy Servers



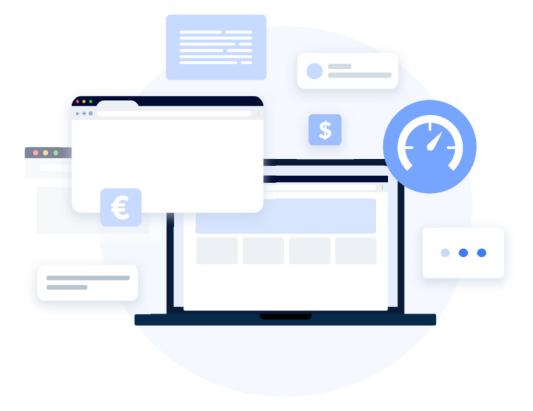
Fastest response time in the industry





3,000+ Super Proxy Servers stationed close to our peers across the globe for fastest service





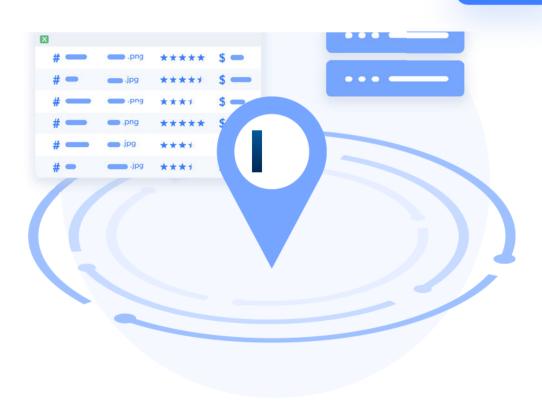


Access the most advanced Datacenter proxy network in the industry built of multiple IP types across the world, in a shared IP pool or for individual purchase.

<b>②</b>	770 thousand+ Datacenter IPs
	No-hassle integration for first-timers with Bright Data API
	Global coverage, including US, China, & Europe
	Zero bandwidth and target limitations
	Extensive interface – IPs across 3,000+ subnets
<b>?</b>	Country, state, & city-level targeting

#### Start free trial >

Datacenter proxies >





Leverage real residential IPs from any city in the world, assigned by ISPs and leased to Bright Data for your exclusive use, for as long as you require. With guaranteed long sessions you can use the same IP address without limitation and without any obstructions or delays.

Keep your IPs for life



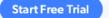
Fastest static residential (ISP) IPs in the industry



700,000+ fully-compliant static residential (ISP) proxies



Used by Fortune 500 & 20K+ businesses



# Start free trial > ISP proxies >



#### **MOBILE PROXIES**

See the web as any real mobile user around the world would with the most advanced Mobile IP Network offering the fastest and largest real-peer 3G/4G IPs network in the world. Our Mobile IP network is located in every city and has

~	

See the web from the eyes of real mobile users



Largest and fastest 3G/4G mobile proxy network



7 million + real 3G/4G mobile IPs from across the world



Say goodbye to IP location blocks and CAPTCHA for good



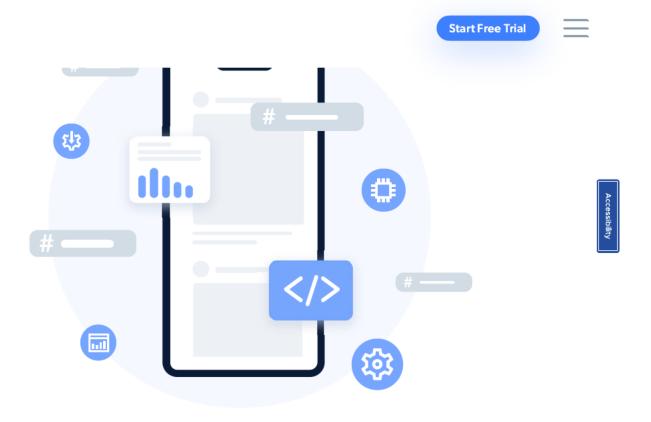
Target any country, city, carrier and ASN



No limits on concurrent connections



Mobile proxies >



The category leader in proxies and data collection

650TB of public data collected every day

170K requests processed per second

Serving 7/10 of the world's leading universities

#### 4.8/5 highest Trustpilot rating in the industry

#### The best customer experience in the industry

#### You ask, we develop

New feature releases every day

#### 24/7 global support

To answer any questions right when you need it

#### **Full transparency**

Real-time network performance dashboard

#### **Dedicated Account Managers**

To optimize your performance

#### **Tailored solutions**

To meet your data collection goals





# All the proxy services you need in one easy-to-use platform

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